



2022-2023 Action Plan

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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The City of Toledo (COT), a designated entitlement City/participating jurisdiction receives an annual allocation of Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME), and Emergency Solutions Grant (ESG) funds from the U. S. Department of Housing and Urban Development (HUD). These federal funds awarded by HUD to the COT assists low- to-moderate-income communities by providing and supporting programs and projects that provide decent, safe and sanitary housing that is both affordable and sustainable and, in addition, expand economic opportunities for low- and moderate-income persons.

In addition, to CDBG, HOME and ESG, the Department of Housing and Community Development (DHCD) received Neighborhood Stabilization Program (NSP) stimulus grants (NSP1, NSP2 and NSP3). The initial NSP funds have been fully expended. NSP2 has been officially closed out with HUD. NSP1 and NSP3 program income will be utilized to complete a proposed project for the 2022 program year.

The COT completes Lead-Based Paint Hazard Control through multiple funding sources. The COT was awarded \$5.7 million from the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) to develop and run a Lead-Based Paint Hazard Control and Healthy Homes program. The three-and-a-half-year grant began 01/04/2021 and concludes on 06/30/2024. The program is to provide financial assistance to property owners to help control lead paint hazards in either owner-occupied and rental residential units where a pregnant female or a child under the age of 6 resides.

Additional multi-year funding in the amount of \$1,000,000.00 was also received from the OLHCHH to pilot a cooperation demonstration between the City's Lead Hazard Reduction grant programs and NeighborWorks Weatherization program. This grant program combines lead hazard control with weatherization and air quality restoration. The three-year program began on 07/29/2021 and concludes on 07/28/2024.

The DHCD also received \$500,000 through the Ohio Department of Health's (ODH) Medicaid State Children's Health Insurance Program (SCHIP) to complete Lead-Based Paint Hazard Control in residential units. The funding period runs from July 1st - June 30th and is re-awarded on an annual basis.

Additional funding for up to \$1,140,000 for Lead-Based Paint Hazard Control was also received from the Toledo-Lucas Regional Health District through a 3-year contract to utilize BP-Husky settlement funds. The contract commenced on 05/01/2021 and concludes 05/01/2024.

The 2022 (48th) Program Year (PY), which begins on July 1, 2022, represents the third year of the City of Toledo's 2020-2024 Five-Year Consolidated Plan. The 2022 (48th) PY Annual Action Plan delineates a one-year strategic plan which includes the proposed use of funds that will be received from HUD. The allocations awarded, once received, will support, and leverage significant resources available in the City of Toledo. These resources will be utilized towards accomplishing the goals listed in the 2020-2024 Five-Year

Consolidated Plan. The goals were established based on local data studies, citizen input and in consultation with community organizations.

The funding allocations from HUD to the COT for the 2022 (48th) PY have been finalized and below are the allocations. All proposed activity budgets were proportionally increased or decreased from the estimated funding levels to match actual allocation amounts.

- Community Development Block Grant (CDBG): **\$7,373,648**
- HOME Investment Partnerships Program (HOME): **\$2,385,225**
- Emergency Solutions Grant (ESG): **\$638,314**

Other resources available in the community are as follows:

- Lead Hazard Control and Healthy Homes Grant: **\$5,024,078**
- 2017 Lead-Based Paint Hazard Control Grant: **\$0**
- NSP1 and NSP3: **\$500,207**
- HUD Healthy Homes & Weatherization: **\$978,813**
- Section 108 Loan Guarantee Authority: **\$37,000,000**
- American Rescue Plan Act (ARPA): **\$14,000,000**
- BP Husky Settlement: **\$1,035,005**
- U. S. Treasury Rental Assistance: **\$22,706,231**
- CARES Act (CDBG-CV): **\$1,449,694**
- CARES Act (ESG-CV): **\$34,234**
- Ohio Department of Health SCHIP Grant: **\$303,864**
- Ohio Department of Health
Pass-Thru Grant to Historic South Initiative for Lead Hazard Control: **\$500,000**

Program Income

Program Income (PI) is the gross income received by the grantee that was directly generated from the use of CDBG, HOME, and NSP funds.

The estimated program income is listed below:

- CDBG Program Income (estimated amount): **\$282,316**
- HOME Program Income: **\$0.00**
- NSP1 and NSP3 Program Income: **\$0.00**

CDBG, HOME, and ESG are annual federal allocations. PI from CDBG, HOME, and NSP are annual projections. The allocations are available to be utilized toward meeting HUD's National Objective.

The COT, in adherence to HUD regulations, will allocate at least 70% of its CDBG entitlement award to programs that directly benefit low- and moderate-income (LMI) individuals, persons with disabilities and

other residents of the City. Likewise, the COT will set aside 15% of its HOME fund allocation for use by Community Housing Development Organizations (CHDOs) recognized and certified by the DHCD.

The COT will allocate funds for both operational and programmatic goals as it pertains to the following:

- Planning and Administration (Operational, Program) - CDBG, HOME, and ESG
- Housing and Neighborhood Revitalization (Operational, Program) - CDBG, HOME, NSP, ARPA and Lead
- Economic Development (Operational, Program) - CDBG
- Fair Housing (Operational, Support) - CDBG
- Public Service (Operational, Program) - CDBG and ESG
- Lead Hazard Control (Operational, Program) - Lead
- HUD Healthy Homes & Weatherization (Operational, Program) - Lead
- BP Husky Settlement (Operational, Program) - Lead
- Public Facilities and Infrastructure (Operational, Program) - CDBG
- Demolition and Blight Removal (Operational, Program) - CDBG

2. Summarize the objectives and outcomes identified in the Plan

The goals and priorities established in the 2020-2024 Five-Year Consolidated Plan were based on community input received through the citizen participation and consultation process. These goals will address neighborhood, community and economic development with an emphasis on improving housing conditions.

The goals of high priority referred to providing safe, adequate and decent affordable housing will be addressed by working in conjunction with nonprofit organizations, for-profit businesses, other City departments, and local and regional organizations striving to improve the conditions of Toledo residents and neighborhoods. Public Service goals addressing community and basic needs will be undertaken, primarily in partnership with the DHCD's non-profit partners or Third-Party Partners. The activities undertaken will predominately benefit low- to moderate-income as defined by 24 CFR part 5.

The COT through the five-year consolidated plan established local priorities consistent with HUD's National Objectives and, by use of CDBG, the City will continue to actively pursue initiatives/activities that will address two of the three HUD national objectives:

- Benefit to low- and moderate-income (LMI) individuals
- Elimination of slum and blight in the community

Summarized information regarding the 2022 (48th) PY goals and objectives is included in section AP-20 Annual Goals and Objectives of the Annual Action Plan. Each goal addresses one of HUD's Objectives and Outcomes listed below:

Objectives:

- **Suitable Living Environment** - create a healthy community by improving the well-being of low- to moderate-income residents through an array of services addressing basic needs and progress toward being self-sufficient.
- **Decent Housing** - to ensure access to healthy, safe and affordable housing for low- to moderate-income households in the City and to advance fair housing to address discrimination.
- **Economic Opportunity** - increase opportunities locally and create jobs.

Outcomes demonstrate how activities or programs will benefit a community or the people served. The three outcomes that will illustrate the benefits of each activity or program funded are:

Outcomes:

- Improve Availability/Accessibility
- Improve Affordability
- Improve Sustainability

All current and future activities that are funded under the five-year consolidated plan and one-year action plan will support at least one objective and one outcome.

The COT will continue to use CDBG funds in low- to moderate-income target areas and the goals will improve neighborhood conditions, economic development and address the needs of low- and moderate-income Toledo residents as identified in the 2020-2024 Five-Year Consolidated Plan.

Furthermore, the goals and actions in this Plan will Affirmatively Further Fair Housing by referencing The Fair Housing Center (TFHC) City of Toledo Analysis of Impediments to Fair Housing Choice July 1, 2020 - June 30, 2025.

3. Evaluation of past performance

As a recipient of CDBG and HOME program funds, the City is required to submit at the end of each program year a Consolidated Annual Performance and Evaluation Performance Report (CAPER). The CAPER summarizes the accomplishments of each program year and the progress made towards the Consolidated Plan goals. As noted in the 2020-2021 Consolidated Annual Performance and Evaluation Report (CAPER), the City has met most of its priority objectives identified in the 2020-2024 Five-Year Consolidated Plan. In many cases, the City exceeded the projected outcomes. Accomplishments for the PY 2021-2022 will be available with the CAPER submittal in September 2022.

Based on the priorities established, the City continues to place emphasis on providing decent, safe, and affordable housing; elimination of homelessness; the implementation of the Fair Housing Action Plan (FHAP); and assistance with basic needs, such as food and healthcare. In PY2020, the Department's involvement in housing projects has greatly impacted the vitality and livability of neighborhoods.

In addition to the above, the CAPER describes how CDBG funds continue to assist in meeting the needs of LMI persons with activities such as feeding programs, rehabilitation of homes, health services, park improvements etc. Furthermore, CDBG funds were used to improve blighted conditions in LMI neighborhoods.

HOME dollars were directed towards: down-payment assistance (DPA); tenant-based rental assistance (TBRA); rehabilitation of owner occupied and rental housing units, with the majority of rehabs dedicated to owner-occupied homes; and special projects such as multi-family and scattered site rehabilitation or new development projects lead by developers and/or local partners.

The DHCD continues to work with the Toledo Lucas County Homelessness Board (TLCHB) in its efforts towards the prevention and elimination of homelessness in the City of Toledo. ESG funds assisted in making significant progress towards the elimination of homelessness in Toledo. The goal of maintaining the current percentage of persons staying in permanent housing for at least 6 months at 85% continues to be met. Rapid Re-housing efforts also continue to be the focus of the Continuum of Care (CoC). PY2021 results for ESG funded programs will be included in the 2021-2022 CAPER submittal in September 2022.

Starting in June 2021 through the delivered report in March 2022, the Division of Code Enforcement engaged with nationally recognized and renowned agencies, the Center for Community Progress and the May 8 Consulting Inc. for a full operations assessment on the approach to Code Enforcement's critical work within our neighborhoods.

As stated in previous action plan updates, the Division is centrally focused on the development of technology to support the data management and governance of the output from the unit. Subsequent to that development, implementation and utilization of those technology pieces, a full operations assessment, delivered with key recommendations, was that next natural step to ensuring optimal processes and resources are appropriate for this work. Key recommendations from the assessment established that compliance with health and housing issues are first and foremost, and a work group of internal and external stakeholders was created to help guide the processes and implementation of an equitable enforcement approach.

The Division will work to create a proactive educational tool set with a communication strategy for enforcement support mechanisms, as well as establishing reasonable responses to requests for service from the community, and how to prioritize those responses based on critical need. Work will continue with setting clear goals and priorities for code enforcement, improving data collection, management and analysis, consistent and equitable enforcement, ensuring safeguards in the enforcement processes, and changing the culture from enforcement to compliance.

The Division of Housing successfully implemented Neighborly Software which is designed for the administration of housing and economic development programs. The software allows for a user-friendly, online application experience for the public and a time- and cost-efficient program and fiscal monitoring experience for City staff. The application portal can be accessed via computer, tablet, or cellular device therefore, mitigating technological barriers that many in the low-to moderate-income population face when attempting to access services.

The software is used by the COT to administer the Emergency Mortgage and Emergency Rental Assistance programs. Since its implementation, the software has allowed the COT to process over 3,000 applications and deployed over \$19 million across all U. S. Treasury ERA award sources to LMI households financially impacted by the COVID-19 pandemic.

The DHCD continues to utilize an online application process via ZoomGrants for CDBG, ESG and HOME grant funding. In addition, all sub-recipients for CDBG and ESG electronically enter accomplishments and submit request for funds reimbursement through this system.

4. Summary of Citizen Participation Process and consultation process

The City's comprehensive approach to citizen participation and the consultation process is detailed in the City of Toledo's Citizen Participation Plan (CPP). Public participation is essential in the planning process because the involvement allows for citizen's perspectives to be highlighted and it ensures that careful attention to community needs are made in the decision-making process.

In the development of the 2022 (48th) PY Annual Action Plan, the COT consulted with non-profit organizations, Lucas Metropolitan Housing (LMH), the Fair Housing Center (TFHC), the Lucas County Homelessness Board (TLCHB), and other regional and local organizations engaged in housing, community and economic development.

Residents were provided with adequate and reasonable access to meetings, information and records relating to the COT's proposed use of funds. Input from residents on the DRAFT Annual Action Plan was solicited through a 30-day comment period that commenced on **Wednesday, March 23, 2022**.

The COT held two public hearings virtually on **Thursday, March 24, 2022** and **Thursday, March 31, 2022** via Zoom. Both public hearings were held at 5:30 p.m. at the end of the workday for the convenience of those who work during normal business hours. The public hearings and 30-day comment period were promoted through a media campaign that included a public notice, press release, and website and Facebook postings. The public notice announcing the availability of the DRAFT Annual Action Plan and 30-day comment period was emailed to the COT's community partners and posted on the Department of Housing and Community Development's website.

Additionally, a Neighborhoods & Community Development Committee hearing was held by City Council on **Thursday, April 7, 2022**. This committee hearing was utilized to provide information on the basics of CDBG and also allowed City Council and the public to ask additional questions on the key initiatives and projects that the City of Toledo will embark on for the 2022 (48th) PY.

Two Citizen Review Committees (CRCs) were established to review and evaluate proposed funding requests. One committee evaluated non-homeless service related applications (which included local 501 (c)(3) non-profit agencies, quasi-government agencies (not-for-profit) and faith-based (not-for-profit) entities). The 2nd committee evaluated homeless service related applications. Members of the CRCs represented various community sectors including: banking, religious, healthcare, public library, financial sector, economic development, and social service agencies.

Additionally, the DHCD regularly consults with community leaders and residents in efforts to collaborate, to improve neighborhood conditions, and to offer basic services to resident. Table 2 of the AP-10 Consultation section lists those agencies or organizations with whom the DHCD consulted with directly.

All public hearings are held in facilities that provide adequate accessibility to disabled individuals, are wheel chair accessible and provide handicapped parking. In the event of a virtual public hearing, services needed by disabled individuals will be provided upon request.

5. Summary of public comments

A total of **18 residents** (3/24/2022 - **10** residents and 3/31/2022 - **8** residents) attended the two virtual public hearings. Presentations regarding the DRAFT Annual Action Plan were made by representatives of the DHCD, LMH, TLCHB and TFHC.

Public comments received at the two public hearings related to:

- An agency asked a question regarding the CDBG minimum application requirements for homeless and non-homeless service providers. In addition, the agency wanted a more detailed explanation regarding demonstrated capacity to implement proposed activities or projects.

Additionally, a letter was received from a resident regarding the 2022-2023 Action Plan. The letter is included in the attachments.

A summary of the public hearings is included in the attachments.

6. Summary of comments or views not accepted and the reasons for not accepting them

All public comments received were accepted.

7. Summary

The COT continues to concentrate efforts in the areas of housing, neighborhood and economic development while ensuring that basic need services are available to residents, particularly, low- to moderate-income residents. CDBG, HOME and the remaining NSP funds are used to assist and leverage programs that provide safe, adequate and decent affordable housing. ESG funds will continue to positively impact the reduction of homelessness in Toledo. The Lead Hazard Control and Healthy Homes (LHCHH) program aids property owners to control lead paint hazards in both owner-occupied and rental residential units in the City of Toledo.

The COVID-19 pandemic has had a major impact on the COT and its residents in many ways. The added funding of the CARES Act is essential in meeting new and challenging needs in the community while the annual CDBG funds have provided continued access to services.

With the implementation of the 2020 Lead Safe Ordinance and the associated Lead-Safe program, the COT will implement the following:

- **HUD CDBG Early Bird Match Grant** - this program was started in 2021 and will continue into the 2022 PY. This grant will be used as an incentive for owners to comply with the new lead ordinance by providing a 50% match on compliance costs, up to \$5,000 per rental unit, for units rented to low- to moderate-income tenants.
- **HUD Healthy Home & Weatherization** - this is a pilot program that will bridge the Lead Hazard Control and Healthy Homes (LHCHH) grant administered by the DHCD with the Weatherization Assistance Program (WAP) administered by NeighborWorks Toledo Region. This 3- year grant is currently in process. A minimum of 40-units must be completed by July 28, 2024.
- **BP Husky Settlement** - working in partnership with the Toledo Lucas County Health District, this grant will be utilized in conjunction with the Lead Hazard Control and Health Homes grant to assist property owners in the control of lead paint hazards. A minimum of 40-units must be completed by March 25, 2023.

The COT is focusing resources on other key initiatives and projects for the 2022 (48th) PY. Through the use of CDBG funds, the COT plans to do the following:

- **Parks** - Revitalizing five (5) parks through the renovation of an enclosed shelter and the replacement of playground equipment.
- **Community Centers** - Completing assessments on some of the community centers located in the City of Toledo and in addition, rehabilitate three neighborhood facilities.
- **Police Athletic League (PAL)** - To renovate the PAL field into a multi-purpose sports field in an under-served area of the City.
- **COT Rooftop Program** - To provide roof repair or replacements in the COT through a partnership with the Department of Housing and Community Development, community partners and financial institutions. Approximately, \$2.6 million of U. S. Treasury funds will be allocated to this project, in addition, to the \$300,000 of CDBG funds.
- **Economic Development** - In partnership with Local Initiatives Support Corporation (LISC) and other CDFIs, create business expansion and real estate development capital funds targeted to emerging neighborhood businesses, small scale manufacturing and minorities and women.
- **HUD Section 108** - The COT through approval from HUD will establish a \$37 million loan pool to provide long-term, fixed rate and reasonably priced financing that is not available conventionally.

The COT is committed to providing residents and stakeholders in its jurisdiction every opportunity to participate in the Consolidated Plan process, including the Annual Action Plan. By working in conjunction with non-profit organizations and many other agencies, the COT strives to meet the goals established in the 2020-2024 Five-Year Consolidated Plan.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

The following are the agencies/entities responsible for preparing the Consolidated Plan and also those responsible for the administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	TOLEDO	Department of Housing and Community Development
HOME Administrator	TOLEDO	Department of Housing and Community Development
ESG Administrator	TOLEDO	Department of Housing and Community Development

Table 1 – Responsible Agencies

Narrative (optional)

The City of Toledo Department of Housing and Community Development is the lead agency responsible for preparing and administering the Consolidated Plan and Annual Action Plan and the use of federal funds from the U. S. Department of Housing and Urban Development (HUD) for the implementation of the goals identified in these plans.

The goals identified in the 2020-2024 Five-Year Consolidated Plan and the 2022 (48th) PY Action Plan are implemented in partnership with non-profits, public housing agency, businesses and other local and regional organizations that work to improve conditions for Toledo residents.

Consolidated Plan Public Contact Information

Department of Housing and Community Development
2020-2024 Five-Year Consolidated Plan
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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

The COT is committed to addressing the needs of the community in the most efficient and effective way possible. Citizen participation and consultation are important aspects in the implementation of the Annual Action Plan.

In the development of the Annual Action Plan, the City consulted with non-profit organizations, Lucas Metropolitan Housing, Toledo Lucas County Homelessness Board, The Fair Housing Center, Lucas County Land Reutilization Corporation (Land Bank) and other regional and local organizations engaged in housing, community, and economic development. Input is solicited through the Citizen Participation Plan (CPP) process, which includes public hearings, a 30-day comment period and direct consultations.

The COT utilized a Citizen Review Committee (CRC), comprised of residents who have general or specific knowledge of existing community programs, understand community issues, and are able to allocate resources when consulted.

Additionally, DHCD's management consults on a regular basis with community leaders in efforts to collaborate on the improvements of neighborhood conditions and offer basic services to residents.

The City of Toledo analyzed the availability of broadband access to low-income households and the strategies being used to narrow what is referred to as the Digital Divide. A period of 2014 through 2017 was used for the analysis and showed that broadband access in general increased by 28 percent. As of 2017, nearly 80 percent of all Toledo households had access to broadband internet and 89 percent had access to a computer. Households without an internet subscription dropped 53 percent over the same four-year period.

Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The COT continues to promote better collaboration and coordination in housing, health, homelessness and related service efforts, and actively partners with local public and private organizations in carrying out activities designed to improve the quality of life for Toledo residents. The City regularly consults with these agencies in the development of plans and opportunities to enhance cooperation and collaboration in the delivery of services to residents. Each year, through the cooperation of major local entities, efforts are aimed at enhancing the coordination between service and housing agencies and private and public sector agencies in order to reduce gaps in service.

Lucas County Emergency Management Agency (LCEMA) prepared the Lucas County Mitigation Plan of 2019, which is an update of the Countywide All-Natural Hazard Mitigation plan of 2013. The plan's purpose as stated was "to identify risks and vulnerabilities from hazards that affect Lucas County, Ohio to prevent or reduce the loss of life and injury and to limit future damage costs by developing methods to mitigate or eliminate damage from various hazards." The City partnered with LCEMA and other

jurisdictions to further identify, define, and characterize the hazards affecting the City and prioritize projects that reduce hazard vulnerability of households especially those with low incomes. Technological/human caused hazards such as civil disturbance and terrorism and natural hazards including severe winter storms and temperature extremes due to climate change were added.

The Plan's Section 2.2.2 defines vulnerability as "measure of the propensity of an object, area, individual, group, community, country, or other entity to incur the consequences of a hazard" (Coppola, 2015, p. 33). Vulnerability can be impacted by income disparity, class, race or ethnicity, and disability to name a few factors. Hazards associated with climate change have been shown to have a disparate impact on LMI households due to poor housing conditions that many of these households live in whether renters or homeowners. These housing structures tend to suffer disproportionately during disasters. The Plan also addressed challenges faced by persons with disabilities accessing transportation to evacuate and shelters and post disaster housing. The Housing Market Analysis section of this Plan identifies the need for home repair especially among the elderly and inadequate shelters and permanent housing for the at-risk of homeless especially during disasters.

According to Ohio Emergency Management Agency, in Lucas County, there have been 78 repetitive loss (damage on two occasions) properties and eight severe repetitive loss (damage on four or more occasions) properties. The City has the most repetitive loss and severe repetitive loss properties in total. Another area of vulnerability for housing owned by LMI households is the cost of property insurance for persons on fixed income especially flood insurance. In some areas with many LMI households, the cost and availability of insurance is inadequate.

Other relationships exist that consist of the business community, faith-based organizations, public service entities, housing providers, foundations, and other community organizations that advocate on behalf of those in need. Increased communication with all community stakeholders will continue to result in more formalized relationships that nurture and promote the City of Toledo's plans and goals.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

TLCHB promotes an inclusive and comprehensive planning continuum, including the establishment of a CoC Interagency Council. The Interagency Council will include representation from all CoC partner organizations that formally operate as a member of the CoC. Key thresholds for consideration as a member of the CoC Interagency Council include but are not limited to: status as recipient or sub-recipient of CoC and/or ESG program funds, participation in the CoC Coordinated Entry System, and participation in the Homelessness Management Information System (HMIS). The Interagency Council will be responsible for providing input, expertise, and recommendations to the TLCHB Board of Directors and the TLCHB Executive Director regarding all matters relating to Continuum of Care responsibilities, policies, and procedures. TLCHB is currently facilitating a holistic and comprehensive strategic planning process that will include a resource/asset map, shelter facility study, and ultimately produce a strategic plan to be adopted by the CoC that identifies updated priorities, goals, and action steps to further collaboration and accelerate solutions toward accomplishing those goals.

TLCHB oversees the local Coordinated Entry System operations for the CoC, which includes a universally accessible main access point through its partnership with United Way 2-1-1. All residents within Lucas County can present as homeless or at-risk of becoming homeless by calling 2-1-1. TLCHB's Coordinated Entry process includes prevention and diversion efforts, as well as a referral to a shelter if appropriate.

When presenting as homeless or at-risk of homelessness, residents will be expeditiously assessed and prioritized to be considered for referral to housing. The State of Ohio's Housing Crisis Response Program and the United Way of Greater Toledo's funds are used to leverage Project Home (RRH). TLCHB is the Project Home project manager which also includes participation from Leading Families Home, United Way of Greater Toledo, Catholic Charities, and Lutheran Social Services. Project Home is charged with providing financial and support service resources deemed necessary for people to either obtain or maintain permanent housing. Their efforts are focused on those households at imminent risk of losing housing; persons exiting shelter and transitional housing; persons released by public institutions without permanent housing placement; and adequate community response in the areas of housing, education, and employment. The project perfectly demonstrates the benefits of collaborative and comprehensive efforts to end homelessness.

In partnership with Lucas Metropolitan Housing, TLCHB has administered **123** HUD Emergency Housing Vouchers. Referrals have been approved or are pending approval for all **123** voucher applicants. TLCHB manages the No Barriers Housing Initiative, a local Housing First initiative designed to provide specially designated Housing Choice Vouchers to individuals who have been identified as chronically homeless. The No Barriers Housing Initiative includes regular by-name case management review, and an expanding partnership with Lucas Metropolitan Housing and Unison Behavioral Health Services. More than 60 chronically homeless individuals were successfully housed in the last year and the Lucas Metropolitan Housing has offered to allocate additional vouchers moving forward. The CoC at large is home to a specific 24-hour shelter designed for at risk and fleeing youth, Safety Net. Finally, TLCHB manages and maintains a family list for rapid and permanent supportive housing solutions for households with children experiencing homelessness.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

The COT works in conjunction with TLCHB, the lead agency in the Continuum of Care (CoC), for all issues related to the elimination of homelessness in Toledo. The City of Toledo Department of Housing and Community Development, in close partnership with the TLCHB, develops and implements the local process for allocating ESG funds. ESG funds are allocated by the DHCD in accordance with the requirements of the Homeless Emergency Assistance and Rapid Transitions to Housing (HEARTH) Act of 2009.

Written standards adopted by the CoC establish policies and procedures to be followed by the individual CoC members in the implementation of the ESG program. The allocation of ESG funds includes the engagement of a Citizens Review Committee (CRC) whose members evaluate applications submitted by area homeless providers and makes funding recommendations to the department.

An explanation of the use of ESG funds is included in the public hearings that are held as part of the Consolidated and Annual Action Plan development process to allow the community an opportunity to provide input on proposed ESG allocations. CoC members are typically present at the public hearings and are aware of the 30-day comment period on the published DRAFT Annual Action Plan. Additionally, CoC members communicate directly with the Department of Housing and Community Development if any issues/concerns arise in the allocation process.

CoC Quality and Performance Committee recommended performance standards and evaluation outcomes for providing ESG and CoC assistance, which include OH-501 Toledo/Lucas County CoC Written Standards, coordinated entry system written standard, performance indicators and the Project Home re-housing policy. These written standards have been approved by the TLCHB and are included in the attachments.

HMIS funds are also administered by TLCHB in accordance with the HEARTH Act and all data entered in HMIS is regularly evaluated to assess progress towards the elimination of homelessness. The TLCHB maintains open two-way communication with CoC members relative to the use of the system and compliance with the reporting standards for HMIS. The TLCHB offers technical assistance as needed to those reporting into the Homeless Management Information System (HMIS).

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities

1	Agency/Group/Organization	Lucas Metropolitan Housing (LMH)
	Agency/Group/Organization Type	Housing PHA
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Lucas Metropolitan Housing (LMH) was consulted to assist in determining housing needs; how LMH serves those in need for public housing (including people with disabilities); and plans to meet public housing needs. The DHCD maintains regular communications with LMH leaders regarding issues related to public housing and its residents. Consultations with LMH will continue in efforts to provide safe, adequate, and decent affordable housing to low-income individuals and their families, including the rehabilitation and resale of Low-Income Housing Tax Credit projects that have ended their 15-year compliance period.
2	Agency/Group/Organization	Toledo Lucas County Homelessness Board (TLCHB)
	Agency/Group/Organization Type	Continuum of Care Lead Agency
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Toledo Lucas County Homelessness Board (TLCHB) is consulted regularly in all aspects related to ending homelessness in Toledo. TLCHB was consulted in the development of this Annual Action Plan. TLCHB is also a sub-recipient of HOME funds to carry out Tenant Based Rental Assistance (TBRA) activities. The COT will continue to work collaboratively with the TLCHB on all issues related to homelessness.

3	Agency/Group/Organization	The Fair Housing Center (TFHC)
	Agency/Group/Organization Type	Housing Services - Housing Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Fair Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The COT contracted with The Fair Housing Center for the development of the Analysis of Impediments (AI). Through the AI, the Fair Housing Center develops action steps needed for the elimination of impediments. The COT will continue to work collaboratively with the Fair Housing Center towards the elimination of barriers to Fair Housing.
4	Agency/Group/Organization	Lucas County Land Reutilization Corporation (Land Bank)
	Agency/Group/Organization Type	Housing Services - Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The COT consults with the Lucas County Land Reutilization Corporation (Land Bank) in addressing issues related to vacant or abandoned properties. As resources become available, the Land Bank assists the COT in the reduction of blight within the City limits particularly through the demolition of unsafe units and rehabilitation projects.

Table 2 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

All pertinent agencies in the City and County were consulted.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Toledo Lucas County Homelessness Board	Elimination of Homelessness is a goal in both the CoC CASE Plan and the City of Toledo 2020-2024 Five-Year Consolidated Plan. The COT works with the CoC to implement strategies toward the elimination of homelessness.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City of Toledo Department of Housing and Community Development has cultivated many relationships in the community leading to the development of efficient strategies that assist in addressing community issues. Those relations include individuals, neighborhood groups, investors and organizations working towards the stabilization and growth of Toledo. The DHCD will continue to cultivate relationships that result in an effective and efficient implementation of the Consolidated Plan.

The Department has consulted with Buckeye Broadband, a local internet services provider, to discuss efforts to narrow the digital divide for underserved populations. Buckeye Broadband, through its corporate giving program, provides free internet services to community centers, libraries, and senior citizen centers. As opportunities arise to extend internet service to LMI individuals, the City anticipates further collaboration with Buckeye Broadband in meeting these needs.

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

The Citizen Participation Process is essential in the development of the Annual Action Plan. The COT engages in two Citizen Review Committees (CRCs), for non-homeless and homeless services, comprised of residents who have general or specific knowledge of community programs and understand community issues. The CRC members representing the following community sectors: banking, religious, healthcare, public library, economic development and social service agencies were utilized for the application evaluations, interviews of potential agencies and funding recommendations.

Public Notices were published two weeks in advance for all related events in The Blade, the Toledo Journal and/or Sojourner's Truth and La Prensa (minority papers) and also posted on the COT's website. Minority papers target the African-American and Hispanic communities.

The notices were published as follows:

November 21 and November 24, 2021 - Announcing the mandatory application packet pickup held **January 14, 2022**.

January 10, 2022 - Press Release announcing the mandatory application packet pickup sent to Mayor's Office for release to the news and social medias.

March 2 and March 6, 2022 - Announcing the availability of the DRAFT 2022-2023 Action Plan, the 30-day comment period and the public hearings.

March 8, 2022 - Press Release on the availability of the DRAFT 2022-2023 Action Plan, the 30-day comment period and the public hearings sent to Mayor's Office for release to the news and social medias.

Additionally, all Public Notices and Press Releases are sent via email to local community partners and the COT's Third-Party Partners. Public comments were accepted beginning **March 23, 2022** through **April 21, 2022**.

Two Virtual Public Hearings were held at 5:30 p.m. on **March 24, 2022** and **March 31, 2022** via Zoom. All public hearings are held in facilities that provide adequate accessibility to disabled individuals, are wheelchair accessible and provide handicap parking. In the event of a virtual public hearing, services needed by disabled individuals will be provided upon request.

The Department consulted with Buckeye Broadband, a local internet services provider, to discuss efforts to narrow the digital divide for underserved populations. Buckeye Broadband, through its corporate giving program, provides free internet services to community centers, libraries, and senior citizen centers. As opportunities arise to extend internet service to LMI individuals, the City anticipates further collaboration with Buckeye Broadband in meeting these needs. The COT analyzed the availability of broadband access to low-income households and the strategies being used to narrow what is referred to as the Digital Divide. A period of 2014 through 2017 was used for the analysis and showed that

broadband access in general increased by 28 percent. As of 2017, nearly 80 percent of all Toledo households had access to broadband internet and 89 percent had access to a computer. Households without an internet subscription dropped 53 percent over the same four-year period.

Lucas County Emergency Management Agency (LCEMA) prepared the Lucas County Mitigation Plan of 2019, which is an update of the Countywide All-Natural Hazard Mitigation plan of 2013. The Plan's purpose as stated was "to identify risks and vulnerabilities from hazards that affect Lucas County, Ohio to prevent or reduce the loss of life and injury and to limit future damage costs by developing methods to mitigate or eliminate damage from various hazards." The City partnered with LCEMA and other jurisdictions to further identify, define, and characterize the hazards affecting the City and prioritize projects that reduce hazard vulnerability of households especially those with low incomes. Technological/human caused hazards such as civil disturbance and terrorism and natural hazards including severe winter storms and temperature extremes due to climate change were added.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Newspaper Ad	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	N/A	N/A	N/A	<p>http://www.toledoblade.com/</p> <p>http://www.thetoledojournal.com/</p> <p>http://www.laprensatoledo.com/</p> <p>http://www.thetruthtoledo.com/</p>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Hearing	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>A total of 18 residents (3/24/2022 - 10 residents and 3/31/2022 - 8 residents) attended the two virtual public hearings.</p>	<p>Public comments were as follows: An agency asked a question regarding the CDBG minimum application requirements for homeless and non-homeless service providers. In addition, the agency wanted a more detailed explanation regarding demonstrated capacity to implement proposed activities or projects.</p> <p>Additionally, a letter was received from a resident regarding the 2022-2023 Action Plan. The letter is included in the attachments.</p>	<p>All comments were accepted.</p>	<p>https://toledo.oh.gov/departments/housing-community-development</p>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Internet Outreach	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>The public notice was posted on the City's website. The COT is unable to determine number of persons accessing the information online.</p>	N/A	N/A	https://toledo.oh.gov/departments/housing-community-development
4	Social Media	<p>Minorities</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>The public notice was posted on the City's social media sites. The COT is unable to determine number of persons accessing the information online.</p>	N/A	N/A	https://m.facebook.com/cityoftoledo/

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The table below summarizes expected resources available to address the goals of this Annual Action Plan. For its PY 2022-2023 Annual Action Plan, the City received entitlement funding in the amount of **\$7,373,648** in CDBG, **\$2,385,225** in HOME and **\$638,314** in ESG. Other funds available to the community are listed in this section as they impact the goals of this plan and contribute to addressing community needs as identified in the 2020-2024 Five-Year Consolidated Plan.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Public - Federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	7,373,648	282,316	1,914,215	9,570,179	0	Per HUD, the Community Development Block Grant (CDBG) program is a flexible program that provides communities with resources to address a wide range of unique community development needs. The CDBG program works to ensure decent affordable housing, to provide services to the most vulnerable in our communities, and to create jobs through the expansion and retention of businesses. The annual allocations are typically fully expended every program year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	Public - Federal	Acquisition						Per HUD, the HOME Investment Partnerships Program (HOME) provides formula grants to States and Localities that communities use to fund a wide range of activities including homeowner rehabilitation, home buyer activities, rental housing and tenant-based rental assistance (TBRA), with the intent to provide safe, adequate and decent affordable housing to low-income households and expand the capacity of non-profit housing providers.
		Homebuyer assistance						
		Homeowner Rehab						
		Multifamily Rental New Construction						
		Multifamily Rental Rehab						
		New Construction for Ownership						
		TBRA	2,385,225	0	1,889,320	4,274,545	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	Public - Federal	Conversion and Rehab for Transitional Housing						In accordance with the McKinney-Vento Homeless Assistance Act, as amended, by the Homeless Emergency Assistance Rapid Transition to Housing (HEARTH) Act, HUD distributes Emergency Solutions Grant (ESG) funds to communities for street outreach, emergency shelter, homelessness prevention, rapid rehousing assistance, and homeless management information systems (HMIS). The annual allocations are typically expended every program year.
		Financial Assistance						
		Overnight Shelter						
		Rapid Re-Housing (Rental Assistance)						
		Rental Assistance Services						
		Transitional Housing	638,314	0	0	638,314	0	

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Continuum of Care	Public - Federal	Admin and Planning Rapid Re-Housing (Rental Assistance) Rental Assistance TBRA Transitional Housing	4,476,415	0	0	4,476,415	0	The Continuum of Care (CoC) Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly re-house homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.
Other: Lucas County Land Reutilization Corporation (Land Bank)	Public - Local	Admin and Planning Other: Demolition and Land Acquisition	4,450,000	0	0	4,450,000	0	The Lucas County Land Reutilization Corp. (Land Bank) is a community improvement corporation designed to strengthen neighborhoods in Lucas County by returning vacant and abandoned properties to productive use. The estimate is based on the organization's current budget. The City of Toledo does not receive or administer these funds.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other: HUD Office of Lead Hazard Control and Healthy Homes	Public - Federal	Admin and Planning Homeowner Rehab Housing Multi-Family Rental Rehab Other: Lead Hazard Control Abatement	 5,024,078	 0	 0	 5,024,078	 0	The City of Toledo received funds from the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) to provide financial assistance to property owners to help control lead paint hazards in both owner-occupied and rental residential units within the City of Toledo.
Other: CDBG-CV	Public - Federal	Other: To prevent, prepare for and respond to the Coronavirus	 1,449,694	 0	 0	 1,449,694	 0	CDBG-CV funds to be used to prevent, prepare for and respond to the Coronavirus. CDBG-CV - 1st round \$4,453,360 CDBG-CV - 3rd round \$1,526,505
Other: ESG-CV	Public - Federal	Other: To prevent, prepare for and respond to the Coronavirus	 34,234	 0	 0	 34,234	 0	ESG-CV funds to be used for homeless services to prevent, prepare for and respond to the Coronavirus. ESG-CV - 1 st round \$2,249,248 ESG-CV - 2 nd round \$2,626,090

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other: United States Department of the Treasury	Public - Federal	Rental Assistance	22,706,231	0	0	22,706,231	0	The United States Department of the Treasury is providing funds to assist individuals and families with up to 6 months of rental assistance.
Other: Lead Hazard Control and Health Homes	Public - Federal	Admin and Planning Homeowner Rehab Housing Multi-Family Rental Rehab Other: Lead Hazard Control and Abatement	978,813	0	0	978,813	0	A pilot program that will bridge the Lead Hazard Control and Healthy Homes (LHCHH) grant administered by the Department of Housing and Community Development with the Weatherization Assistance Program (WAP) administered by NeighborWorks Toledo Region.
Other: BP Husky Settlement	Private	Homeowner Rehab Housing Multifamily Rental Rehab Other: Lead Hazard Control and Abatement	1,035,005	0	0	1,035,005	0	Working in partnership with the Toledo Lucas County Health District, this grant will be utilized in conjunction with the Lead Hazard Control and Health Homes grant to assist property owners in the control of lead paint hazards.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other: Neighborhood Stabilization Program	Public - Federal	Acquisition Admin and Planning Homeowner Rehab New Construction for Ownership	500,207	0	0	500,207	0	Beginning in 2009, the COT received NSP funds from HUD for concentrated efforts in revitalizing areas with the highest concentration of foreclosures. The initial NSP funds have been fully expended. NSP2 has been officially closed out. NSP1 and NSP3 program income will be utilized to complete a proposed project for the 2022 program year.
Other: American Rescue Plan ACT (ARPA)	Public - Federal	Other: Assistance for Homeless Related	950,000	0	0	950,000	0	Toledo Public Schools will use the American Rescue Plan funding for school transportation, school supplies, school uniforms, tutoring and programming needs. Additional staff will focus on truancy prevention and trauma care will be hired as well.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
Other: Ohio Department of Health SCHIP Grant	Public - Federal	Admin and Planning Homeowner Rehab Housing Multifamily Rental Rehab Other: Lead Hazard Control and Abatement	303,864	0	0	303,864	0	The DHCD received funding through the Ohio Department of Health's (ODH) Medicaid State Children's Health Insurance Program (SCHIP) to complete Lead-Based Paint Hazard in residential units. The funding period runs from July 1 - June 30 and is re-awarded on an annual basis.
Other: Ohio Department of Health	Public - Federal	Admin and Planning Homeowner Rehab Housing Multifamily Rental Rehab Other: Lead Hazard Control and Abatement	500,000	0	0	500,000	0	The DHCD received additional funding through the Ohio Department of Health's (ODH) for a pass-thru Grant to Historic South Initiative for Lead Hazard Control.

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG funding is the primary source for many of the goals outlined in the 2020-2024 Five-Year Consolidated Plan and Annual Action Plans. The combination of federal funds with other state and local recourse, gives the community increased capacity to address many of the community needs. The combined resources, as well as efficiencies created through strategic partnerships with other organizations, also gives the City an increased capacity to address the needs identified in the Consolidated Plan. In combining HUD funds with these other resources, we can expand the availability of the many benefits these programs provide. These combined resources are used in efforts to increase homeownership for low- to moderate-income residents, address the crisis of homelessness, create a more suitable living environment, provide decent, safe and sanitary housing, address blight and many other beneficial activities.

HOME and ESG funds both have mandated matching requirements. While CDBG funds do not require a match, as a policy of the DHCD, all third-party partners that receive an allocation must provide a 1:1 match for each dollar received. Applicants receiving CDBG and ESG funds must identify and document the match in their funding applications as well as throughout the program year. The match requirement for HOME funds is set by HUD based on criteria related to severe fiscal distress. As stated in CFR 92.218, contributions counted as a match must total not less than 25% of funds drawn from HOME. The City's 2021 matching requirement continues at 0% and it is expected to remain the same for 2022.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

To carry out housing, economic and community development activities, CDBG and HOME funded programs may obtain publicly owned land or property through the Lucas County Land Reutilization Corporation (Land Bank). The Land Bank acquires residential and commercial properties for renovation and demolition. The Land Bank will acquire vacant land for project assembly, side lot opportunities, and long term holding and maintenance in partnership with the City of Toledo. The Land Bank assists eligible residents in purchasing and renovating properties, and partners with community members in utilizing vacant lots from demolitions for re-use by residents, community groups, and neighborhood leaders. Vacant lots are sometimes offered to neighboring homeowners to increase lot sizes.

In meeting HUD's CDBG objective of benefit to low- and moderate-income persons and Elimination of Slum and Blight, the Land Bank aids in meeting the following goals and objectives established in this plan:

- Demolition of Blighted Properties
- Decrease Rodents in the City of Toledo
- Establish and Maintain Community Gardens
- Contaminated Sites Remediation for Re-development
- Down Payment/Closing Costs Assistance (through acquisition and rehabilitation of properties)
- New construction (only by Community-Based Development Organizations CBDO's)

Additionally, CDBG funds will be used to promote economic development opportunities by assisting for profit businesses with the attraction or retention of businesses and jobs, façade improvements, and tax and real estate incentives.

Discussion

The City is engaged in funding and participating in multiple community planning efforts with a variety of stakeholders. These sessions have led to the development of several community plans with clear vision, goals, objectives, and proposed activities along with possible sources of financing. The City has been investing in these neighborhoods and saw an opportunity to leverage its CDBG, HOME, and ESG funds with other City capital expenditures and private sector financing. The City is also reviewing its service delivery system to ensure it is both efficient and effective. The use of external organizations including community-based non-profits to deliver some services instead of internal departments was discussed. Organizational capacity of subrecipients, greater collaboration, and helping them to access other sources of funding was also highlighted.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	HOME: Home Buyer Development	2020	2024	Affordable Housing	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation	HOME: \$200,000	Homeowner Housing Added: 6 Household Housing Unit
2	Home Buyer Down Payment/ Closing Costs Assistance	2020	2024	Affordable Housing	Citywide	Improving Housing Affordability	HOME: \$100,000	Direct Financial Assistance to Homebuyers: 15 Households Assisted
3	Large Rental Housing/Low-Income Housing tax Credit	2020	2024	Affordable Housing	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation	HOME: \$1,188,918 \$1,352,784 (carryover)	Rental Units Constructed: 30 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Code Enforcement & Nuisance Abatement incl. Rental	2020	2024	Non-Housing Community Development	Citywide Low to Moderate Income & Slum and Blight	Improving Neighborhood Conditions	CDBG: \$1,235,824	Housing Code Enforcement/Foreclosed Property Care: 25,000 Household Housing Unit
5	Improvements to Parks and Community Facilities	2020	2024	Non-Housing Community Development	Citywide Low to Moderate Income & Slum and Blight	Improving Neighborhood Conditions	CDBG: \$895,785 \$1,414,215 (carryover)	Other: 11 Other
6	Slum and Blight Reduction	2020	2024	Non-Housing Community Development	Citywide Low to Moderate Income & Slum and Blight	Improving Neighborhood Conditions	CDBG: \$111,262	Housing Code Enforcement/Foreclosed Property Care: 1,025 Household Housing Unit
7	Home Repairs for Seniors and the Disabled	2020	2024	Affordable Housing Non-Homeless Special Needs	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Adequate Housing & Services for Other Special Need	CDBG: \$450,000	Homeowner Housing Rehabilitated: 146 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Housing Repairs and Rehabilitation	2020	2024	Affordable Housing	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation	CDBG: \$1,040,000 HOME: \$300,000 \$289,837 (carryover)	Homeowner Housing Rehabilitated: 179 Household Housing Unit
9	Business Recruitment/Retention Assistance	2020	2024	Non-Housing Community Development	Citywide	Econ Dev: Job Creation/Access and Business Asst.	CDBG: \$170,000 \$500,000 (carryover)	Businesses assisted: 7 Businesses Assisted
10	Coordinated Access for Homelessness	2020	2024	Homeless Non-Housing Community Development	Citywide	Adequate Housing & Services for Homeless/At Risk	ESG: \$204,759 CDBG: \$112,054	Other: 3 Other
11	Rapid Re-Housing and Direct Financial Assistance	2020	2024	Affordable Housing Homeless	Citywide	Adequate Housing & Services for Homeless/At Risk	ESG: \$136,800	Tenant-based rental assistance/Rapid Rehousing: 80 Households Assisted
12	Increase Number of Emergency Shelters	2020	2024	Affordable Housing Homeless	Citywide	Adequate Housing & Services for Homeless/At Risk	CDBG: \$56,000 ESG: \$296,755	Homeless Person Overnight Shelter: 775 Persons Assisted
13	Increase in Transitional Housing	2020	2024	Affordable Housing Homeless	Citywide	Adequate Housing & Services for Homeless/At Risk	CDBG: \$90,000	Overnight/Emergency Shelter/Transitional Housing Beds added: 21 Beds

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
14	Increase or New Public Services	2020	2024	Non-Housing Community Development	Citywide	Provide and expand Public (Social) Services - 15%	CDBG: \$697,993	Public service activities other than Low/Moderate Income Housing Benefit: 13,134 Persons Assisted
15	Fair Housing Planning & Services	2020	2024	Non-Housing Community Development	Citywide	Fair Housing	CDBG: \$150,000	Public service activities other than Low/Moderate Income Housing Benefit: 3,507 Persons Assisted
16	HOME CHDO Set-Aside	2020	2024	Affordable Housing	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation	HOME: \$357,784 \$246,699 (carryover)	Homeowner Housing Rehabilitated: 5 Household housing Unit
17	Improved Neighborhoods by Comprehensive Planning	2020	2024	Non-Housing Community Development	Citywide Low to Moderate Income & Slum and Blight	Improving Neighborhood Conditions	CDBG: \$115,025	Other: 2 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
18	Planning and Administration - CDBG	2020	2024	Affordable Housing Public Housing Homeless Non-Homeless Special Needs Non-Housing Community Development	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Econ Dev: Job Creation/Access and Business Asst. Adequate Housing & Services for Homeless/At Risk Provide and expand Public (Social) Services - 15% Fair Housing Improve Public Infrastructure for LMI Households	CDBG: \$1,199,705	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
19	Housing Rehabilitation Administration - CDBG	2020	2024	Affordable Housing	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation	CDBG: \$900,000	Other: 1 Other
20	HOME Administration	2020	2024	Affordable Housing Public Housing Homeless	Citywide	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Adequate Housing & Services for Homeless/At Risk	HOME: \$238,523	Other: 1 Other
21	Establish and Maintain Community Gardens	2020	2024	Non-Housing Community Development	Citywide Low to Moderate Income & Slum and Blight	Improving Neighborhood Conditions Provide and expand Public (Social) Services - 15%	CDBG: \$150,000	Public service activities other than Low/Moderate Income Housing Benefit: 3,245 Persons Assisted

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	HOME: Home Buyer Development
	Goal Description	The City will use HOME funding for new construction or acquisition rehab of single-family homes for homeownership.
2	Goal Name	Home Buyer Down Payment/Closing Costs Assistance
	Goal Description	The City will use HOME funding for down payment and closing costs assistance for low- to moderate-income first-time homebuyers.
3	Goal Name	Large Rental Housing/Low-Income Housing Tax Credit
	Goal Description	The City will provide HOME funding to assist developers with the new construction and preservation of large multi-family rental housing projects for low- to moderate income tenants including low-income housing tax credit (LIHTC) funded projects.
4	Goal Name	Code Enforcement & Nuisance Abatement incl. Rental
	Goal Description	The City will administer CDBG funds for inspections, legal, and service delivery costs for enforcement of housing codes to reduce blighted properties and improve neighborhood conditions in low- to moderate-income and slum and blight areas.
5	Goal Name	Improvements to Parks and Community Facilities
	Goal Description	The City will provide CDBG funding for improvements to parks and recreational facilities in low- to moderate-income (LMI) areas or that benefit LMI residents.
6	Goal Name	Slum and Blight Reduction
	Goal Description	<p>The City will provide CDBG funding to reduce blight by prosecuting property owners who fail to comply with Toledo Municipal Codes related to nuisance orders in low- to moderate-income areas.</p> <p>The City of Toledo will coordinate with the Toledo/Lucas County Land Reutilization Program (Land Bank) which is a community improvement corporation designed to strengthen neighborhoods in Lucas County by returning vacant and abandoned properties to productive use.</p>
7	Goal Name	Home Repairs for Seniors and the Disabled
	Goal Description	The City will provide CDBG funding to be reallocated to home repairs and accessibility modifications to allow mainly seniors and people with disabilities to remain in their residences, including emergency repairs.
8	Goal Name	Housing Repairs and Rehabilitation
	Goal Description	The City will provide HOME and CDBG funding to provide housing assistance for rehabilitation of existing owner-occupied housing for low income households.

9	Goal Name	Business Recruitment/Retention Assistance
	Goal Description	The City will allocate CDBG funds to programs and assistance to encourage establishment and growth of small and medium private business (grants/loans/technical assistance/incentives).
10	Goal Name	Coordinated Access for Homelessness
	Goal Description	<p>The City will allocate CDBG and ESG funds to operate a centralized system for homeless assistance to determine needs and match individuals/families with the type of assistance needed.</p> <p>The City of Toledo will coordinate with other funding for homeless related assistance available through the McKinney-Vento Homelessness Assistance Act and the Toledo Lucas County Continuum of Care. These funds are not administered by the City but contribute to homelessness prevention and reduction. Outcomes will be generated by the administrators of the funds.</p>
11	Goal Name	Rapid Re-Housing and Direct Financial Assistance
	Goal Description	Provide rental financial assistance using HOME and CDBG funding to prevent homelessness and assist the homeless in obtaining/retaining permanent housing.
12	Goal Name	Increase Number of Emergency Shelters
	Goal Description	Provide temporary shelter for the homeless for a period of 90 days or less. Supportive services may or may not be provided in addition to shelter.
13	Goal Name	Increase in Transitional Housing
	Goal Description	Provide supportive housing services to facilitate the movement of homeless individuals and families to permanent housing, generally for up to 24 months.
14	Goal Name	Increase or New Public Services
	Goal Description	Provide CDBG funding for Public Services including crime and safety, programs for youth and seniors, community, non-profit capacity building, etc. carried out by community-based non-profits
15	Goal Name	Fair Housing Planning & Services
	Goal Description	Elimination of discrimination in the provision of housing and housing-related services and elimination of segregation by affirmatively promoting inclusive communities and increasing supply of genuinely open housing.
16	Goal Name	HOME CHDO Set-Aside
	Goal Description	The City will use HOME funding for the 15% set aside for community housing development corporations (CHDOs) and operating assistance to build new or rehabilitate single or multi-family housing for low to moderate-income households.

17	Goal Name	Improved Neighborhoods by Comprehensive Planning
	Goal Description	Planning and administrative activities related to the processing of applications and community studies including the Toledo's 2020 Comprehensive Plan to lead neighborhood improvements.
18	Goal Name	Planning and Administration - CDBG
	Goal Description	The general operations as it relates to the administration and reporting requirements, administration and staff monitoring of programs, neighborhood revitalization and fiscal oversight.
19	Goal Name	Housing Rehabilitation Administration - CDBG
	Goal Description	The administration of staff costs related to the housing rehabilitation and development programs operated by the Department of Housing and Community Development Housing Division entitlement grant and estimated program income from housing loan repayments will be used for activity delivery costs related to the housing rehabilitation program.
20	Goal Name	HOME Administration
	Goal Description	The administration and staff costs related to the operation of housing rehabilitation and development programs funded by the HOME Program.
21	Goal Name	Establish and Maintain Community Gardens
	Goal Description	Provide use of CDBG funds to establish and maintain community and rain gardens as well as promote urban agriculture in underutilized and vacant lots.

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b)

The following is an estimate of the number of families who will be provided affordable housing as defined by HOME:

- **36** extremely low-income families, and
- **22** low- and moderate-income families.

Projects

AP-35 Projects – 91.220(d)

Introduction

The 2020-2024 Five-Year Consolidated Plan identified priority housing and community development needs in the COT. The DHCD will coordinate the use of federal funds for strategies and actions the City will use to meet the needs of low- to moderate-income households and communities.

Below are the proposed projects/activities that will be undertaken in the 2022 (48th) PY with CDBG, HOME and ESG funding to address the priority needs and objectives in the Consolidated Plan. All proposed activities' budgets were proportionally increased or decreased from the estimated funding levels to match actual allocation amounts.

PROJECTS

#	Project Name
1	DHCD: Planning and Administration
2	DHCD: Housing Rehabilitation Administration
3	DHCD: HOME Administration
4	Community Housing Development Organization (CHDO) Set-Aside
5	Homeowner Rehabilitation (Subrecipient and Internal)
6	Rental Housing Development
7	Home at Last Down Payment Assistance (DPA) Program
8	Home Buyer Development
9	COT: Division of Code Enforcement
10	COT: Department of Economic Development
11	COT: Department of Law
12	COT: Department of Parks and Youth Services
13	Toledo - Lucas County Plan Commission
14	Arts Commission of Greater Toledo Inc
15	Believe Center Inc
16	Compassion Health Toledo
17	East Toledo Family Center
18	Economic and Community Development Institute Inc (ECDI)
19	Fair Housing Opportunities of Northwest Ohio
20	Grace Community Center
21	Historic South Initiative
22	Legal Aid of Western Ohio Inc
23	Lucas County Regional Health District
24	Lucas Housing Services Corporation
25	Martin Luther King Center for the Poor
26	Maumee Valley Habitat for Humanity
27	Neighborhood Health Association of Toledo Inc

#	Project Name
28	NeighborWorks Toledo Region
29	Pathway Inc
30	Sofia Quintero Art & Cultural Center
31	Toledo Design Collective
32	Toledo GROWs
33	Toledo Seagate Food Bank
34	Aurora Project Inc
35	Family House
36	Toledo Lucas County Homelessness Board (TLCHB)
37	HESG-2022 Homeless Services - ESG
38	Community Center Improvements
39	Police Athletic League (PAL)
40	YMCA of Greater Toledo
41	Local Initiatives Support Corporation (LISC) and/or other CDFIs
42	COT Rooftop Program
43	Ironwood Architectural Assessment
44	CDBG Project - TBD
45	Coordinate with other Homeless Related Assistance

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The City of Toledo priorities were allocated based on an analysis of the data from the Citizens Participation and Agency Consultation Process section and information obtained from the Needs Assessment and Market Analysis sections of the 2020-2024 Five-Year Consolidated Plan.

As a result of the analysis, the City identified priority needs and associated goals to address these needs. The priority needs are:

- Improve Housing Affordability
- Improve Neighborhood Conditions
- Increase programs for Home Repair and the Preservation of Existing Affordable Housing
- Create Jobs and Provide access to Job/Skills Training
- Homelessness: Provide Adequate Housing and Services for Special Needs Population
- Provide Adequate Housing and Services for Special Needs Populations
- Other Identified Public Service Community Needs
- Fair Housing
- Improve Public Infrastructure for LMI Households

To address these needs, the goals are as follows: homeownership housing, rental housing, affordable housing capacity, rental housing code enforcement, improvements to parks and community facilities, slum and blight reduction, home repairs especially for elderly, job creation/retention, business assistance, emergency and permanent housing for homeless, and special need populations.

Federal, state, and local budget cuts resulting in a reduction of funding for programs is the primary obstacle to addressing underserved needs within the City. The amount of funding for housing and non-housing activities is not adequate to meet the demand of underserved needs. Typically, the total amount funding requested in recent years exceeds the amount of funding available. Agencies also identified insufficient financial resources as the top barriers to meeting underserved needs. Agencies identified shortage of volunteers, better collaboration between social service agencies, staff turnover and capacity, transportation needs of clients, program eligibility restrictions and marketing and lack of awareness of program services as barriers to meeting underserved needs.

In March 2020, the Ohio Governor issued executive orders for Ohio residents to Stay at Home in order to combat the spread of the Coronavirus (COVID-19) Pandemic. With this executive order, the City Department's day-to-day operations and services provided by our third-party partners were greatly impacted. Upon the subsequent reopening, many of the agencies had to streamline services offered in order to adhere to social distancing. Additionally, meetings and hearings had to be held virtually. The obstacles faced as a result of the Coronavirus Pandemic affected not only the operations and services provided, but also the results needed to achieve outcomes and accomplishments.

In regards to housing, the City contracted with the Toledo Fair Housing Center to complete an Analysis of Impediments to Fair Housing Choice (AI) in 2020 which identified obstacles to obtaining safe, adequate, and decent affordable housing. The City and the Fair Housing Center, in conjunction with community partners, collaborate in the implementation of a Fair Housing Action Plan to remove obstacles to fair and affordable housing in collaboration with community partners. To view a copy of the Analysis of Impediments to Fair Housing Choice, which includes the Fair Housing Action Plan, please visit the Department of Housing and Community Development website at: <https://toledo.oh.gov/departments/housing-community-development>

AP-38 Project Summary

Project Summary Information

1	Project Name	DHCD: Planning and Administration
	Target Area	Citywide
	Goals Supported	Planning and Administration - CDBG
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Econ Dev: Job Creation/Access and Business Asst. Adequate Housing & Services for Homeless/At Risk Adequate Housing & Services for Other Special Need Provide and expand Public (Social) Services - 15% Fair Housing Improve Public Infrastructure for LMI Households
	Funding	CDBG: \$1,199,705
	Description	The general operations as it relates to the administration and reporting requirements, administration and staff monitoring of programs, neighborhoods revitalization and fiscal oversight.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City of Toledo, Department of Housing and Community Development One Government Center, Suite 1800, Toledo, Ohio 43604
	Planned Activities	All of the CDBG funded activities such as funding of staff designated to carry out activities related to the planning, administration, development and implementation of the Consolidated Plan, Annual Action Plan, and the CAPER. These include the following: tracking and compilation of information; federal grants reporting; IDIS data input; fiscal oversight; CDBG activities monitoring (i.e. on-site monitoring visits, review and evaluation of agency information, assessment of progress and completion of activities, compliance with Federal regulations etc.); general administration of funds and related activities.
2	Project Name	DHCD: Housing Rehabilitation Administration
	Target Area	Citywide
	Goals Supported	Housing Rehabilitation Administration - CDBG

	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Adequate Housing & Services for Homeless/At Risk Adequate Housing & Services for Other Special Need
	Funding	CDBG: \$900,000
	Description	The administration of staff cost related to the housing rehabilitation and development programs operated by the Department of Housing and Community Development Housing Division and Partners.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City of Toledo, Department of Housing and Community Development One Government Center, Suite 1800, Toledo, Ohio 43604
	Planned Activities	The activities related to the administration duties of the Housing Division including: Owner-Occupied Rehabilitation; Homebuyer units' production through new construction or acquisition; rehabilitation and resale; down payment and closing costs through the Home-At-Last Program; Paint, Roof, and Emergency Repair Programs; Lead-Based Paint Hazard Programs, and Rental Housing Development Projects.
3	Project Name	DHCD: HOME Administration
	Target Area	Citywide
	Goals Supported	HOME Administration
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Adequate Housing & Services for Homeless/At Risk
	Funding	HOME: \$238,523
	Description	The administration and staff costs related to the operation of housing rehabilitation and development programs funded by the HOME Program.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City of Toledo, Department of Housing and Community Development One Government Center, Suite 1800, Toledo, Ohio 43604

	Planned Activities	The activities include all planning and administration duties of management and the Housing Division staff. The duties include the following: underwriting analysis of all projects including the owner-occupied program and the down payment assistance program; administration and monitoring of tenant-based rental assistance (TBRA) program; all aspects of homeownership financial assistance to eligible applicants; maintenance of records to support compliance with all federal regulations; entry of data into IDIS; and continued evaluation of programs, procedures and policies. Also included is the administrative funding for TBRA Third-Party Partners.
4	Project Name	Community Housing Development Organization (CHDO) Set-Aside
	Target Area	Citywide
	Goals Supported	HOME CHDO Set-aside
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation
	Funding	HOME: \$357,784 HOME: \$246,699 (Carryover)
	Description	The GAP financing and \$100,000 of operating assistance for single- or multi-family rehabilitation or new construction projects owned, developed, or sponsored by Community Housing Development Organizations (CHDOs).
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Five (5) low- and moderate-income households will benefit from this activity.
	Location Description	City-wide
	Planned Activities	The rehabilitation or new construction of single-family homeownership units and/or rehabilitation or new construction of single-family or multi-family rental units.
5	Project Name	Homeowner Rehabilitation (Subrecipient and Internal)
	Target Area	Citywide
	Goals Supported	Housing Repairs and Rehabilitation
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation
	Funding	HOME: \$300,000 HOME: \$289,837 (Carryover)

	Description	To help low- and moderate-income homeowners with housing rehabilitation to restore their homes to decent, safe, and sanitary conditions; thereby preserving the housing stock. Implemented by sub-recipients and the City of Toledo Housing Division.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Fifteen (15) low- and moderate-income homeowners will benefit from this activity.
	Location Description	City-wide
	Planned Activities	To provide owner-occupied rehabilitation to address code violations, health and safety issues including lead-based paint hazards.
6	Project Name	Rental Housing Development
	Target Area	Citywide
	Goals Supported	Large rental housing/low-income housing tax credit
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation
	Funding	HOME: \$1,188,918 HOME: \$1,352,784 (Carryover)
	Description	The gap financing for new construction or rehabilitation of multi-unit rental housing developed by nonprofits or for-profit developers, seniors, and families. The projects are selected based on gap funding needs, consistency with COT affordable housing priorities, readiness to proceed and successfully securing all land use entitlement and project financing commitments.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Thirty (30) low- and moderate-income households will benefit from this project.
	Location Description	City-wide
	Planned Activities	The projects are intended to provide gap financing for developers and agencies developing multi-unit projects. These developments are multi-unit buildings involving new construction, rehabilitation, or repurposing.
7	Project Name	Home at Last Down Payment Assistance (DPA) Program
	Target Area	Citywide
	Goals Supported	Home Buyer Down Payment/Closing Costs Assistance
	Needs Addressed	Improving Housing Affordability
	Funding	HOME: \$100,000

	Description	To provide 0% interest deferred payment loans for down payment and closing cost assistance to eligible first-time home buyer households who are buying single-family units.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Fifteen (15) low- and moderate-income households will benefit from this project.
	Location Description	City-wide
	Planned Activities	To provide down payment and closing cost assistance to low- and moderate-income homebuyers.
8	Project Name	Home Buyer Development
	Target Area	Citywide
	Goals Supported	HOME: Home Buyer Development
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation
	Funding	HOME: \$200,000
	Description	The new construction or acquisition, rehabilitation, and resale of homebuyer units.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Six (6) low- and moderate-income family will benefit from this activity.
	Location Description	City-wide
	Planned Activities	To provide gap financing for new construction or acquisition, rehabilitation, and resale of homebuyer units. The construction and rehabilitation will incorporate green building standards.
9	Project Name	COT: Division of Code Enforcement
	Target Area	Citywide Low to Moderate Income & Slum and Blight
	Goals Supported	Code Enforcement & Nuisance Abatement incl. Rental
	Needs Addressed	Improving Neighborhood Conditions
	Funding	CDBG: \$1,235,824
	Description	To reduce the number of nuisance housing code violations by inspecting properties, issuance of orders, and, as necessary, filing criminal charges in Toledo Municipal Court. The City will coordinate activities with the Toledo/Lucas County Land Bank.
	Target Date	6/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	25,000 households in low- and moderate-income census tracts will benefit from this activity.
	Location Description	City-wide
	Planned Activities	The planned activities include: <ul style="list-style-type: none"> • Inspection of properties for mechanical and cosmetic property maintenance. • Issue appropriate nuisance orders. • File charges to put property owners into Toledo Municipal Housing Court, as needed. • Follow-up on nuisance orders or court cases as appropriate.
10	Project Name	COT: Department of Economic Development
	Target Area	Citywide
	Goals Supported	Business Recruitment/Retention Assistance
	Needs Addressed	Econ Dev: Job Creation/Access and Business Asst.
	Funding	CDBG: \$120,000
	Description	To provide financial support for eligible projects in low- to moderate-income census tracts for businesses owned by under-represented populations in the city.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Three (3) businesses will benefit from this activity.
	Location Description	City-wide
	Planned Activities	The Toledo Inclusion Grant (TIG) will provide financial support up to \$40,000 towards eligible businesses that are owned by an under-represented population, including minority-owned, women-owned, veteran-owned or owned by an individual with a disability and the project is located in a qualified low- to moderate-income census tract in the City.
11	Project Name	COT: Department of Law
	Target Area	Citywide Low to Moderate Income & Slum and Blight
	Goals Supported	Slum and Blight Reduction
	Needs Addressed	Improving Neighborhood Conditions
	Funding	CDBG: \$51,602
	Description	To reduce blight by prosecuting property owners who fail to comply with the Toledo Municipal Codes related to nuisance orders issued by the Code Enforcement Division.

	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	325 housing units in low- and moderate-income census tracts will be compliant as a result of this activity.
	Location Description	City-wide
	Planned Activities	The housing court prosecutor will prosecute criminal and/or civil complaints filed by the Division of Code Enforcement of non-compliant property owners in low- and moderate-income census tracts. In addition, the housing court prosecutor will appear in court and to prosecute cases until compliance, conviction or dismissal of the case occurs.
12	Project Name	COT: Department of Parks and Youth Services
	Target Area	Junction/Englewood Old South End Garfield /Starr/ Raymer Citywide Low to Moderate Income & Slum and Blight
	Goals Supported	Improvements to parks and community facilities
	Needs Addressed	Improving Neighborhood Conditions Improve Public Infrastructure for LMI Households
	Funding	CDBG: \$800,000
	Description	The activities related to the revitalization of five parks (Jamie Farr Park, Clinton Park, Navarre Park, Highland Park and Maya Park) located in the City of Toledo.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	Junction/Englewood areas of the City of Toledo. Garfield/Starr/Raymer areas of the City of Toledo. Old South End areas of the City of Toledo. City-wide targeting areas needing enhancements.
	Planned Activities	To renovate the enclosed shelter at Jamie Farr Park and to replace the playground equipment at Clinton Park, Navarre Park, Maya Park and Highland Park.
13	Project Name	Toledo - Lucas County Plan Commission
	Target Area	Citywide Low to Moderate Income & Slum and Blight
	Goals Supported	Improved Neighborhoods by Comprehensive Planning

	Needs Addressed	Improving Neighborhood Conditions
	Funding	CDBG: \$87,025
	Description	The administrative activities related to the processing of applications and assisting community groups or applicants dealing with the City of Toledo's subdivisions rules and regulations and the Toledo 20/20 Comprehensive Plan.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City-wide targeting areas needing enhancements.
	Planned Activities	<p>The planned activities include the following:</p> <p>Administrative activities related to:</p> <ul style="list-style-type: none"> • Processing of applications dealing with the City of Toledo's subdivision rules and regulations, zoning ordinances and Overlay Districts; • Community planning for commercial and residential areas suffering from disinvestments including detailed development plans; • Assist in the development of neighborhood plans; and, • Assist neighborhood groups.
14	Project Name	Arts Commission of Greater Toledo, Inc
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$22,000
	Description	A six-week, summer youth employment training program for at-risk youths ages 14-19. The program provides summer employment experience in the arts, builds job skills, connections to community and technical skills in the arts.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Thirteen (13) youth ages 14-19 from low- and moderate-income families will benefit from this activity.
	Location Description	City-wide

	Planned Activities	The program activities directed to the development of artistic and job skills include the following: <ul style="list-style-type: none"> • job training through work experience; • transportation services as needed; • team building activities; • mural creation & digital design; and • creation of zines/podcasts/videos.
15	Project Name	Believe Center Inc
	Target Area	Old South End Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$45,000
	Description	To carry out eligible sports, life skills and family and educational programs for youth living in low- and moderate-income census tracts.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Fifty (50) low- and moderate-income youth ages 5-18 will benefit from this project.
	Location Description	City-wide
	Planned Activities	The planned activities will provide opportunities to carry out the following: <ul style="list-style-type: none"> • Youth Sports; • Educational Enhancement Programs (reading, writing and math); and • Recreational Opportunities (field trips, tours, camping and etc.).
16	Project Name	Compassion Health Toledo
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$64,737
	Description	This activity will directly address the problem of high infant mortality by providing comprehensive health care services to high risk obstetric patients. A social worker and two community health workers will assist Health Care Providers in addressing the Social Determinants of Health with pregnant patients.
	Target Date	6/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	140 low- and moderate-income individuals will benefit from this activity.
	Location Description	City-wide
	Planned Activities	The services associated with this activity include the following: <ul style="list-style-type: none"> • complete prenatal care; • complete reproductive plan; • connections to social services in the community; • attend nutrition, parenting and prenatal (including breastfeeding) classes; and • active participation of fathers.
17	Project Name	East Toledo Family Center
	Target Area	Garfield /Starr/ Raymer Citywide
	Goals Supported	Home Repairs for Seniors and the Disabled
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Adequate Housing & Services for Other Special Need Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$60,000
	Description	This project entails two activities: Activity 1: administrative operations for minor repairs and home rehabilitation projects to assist low- and moderate-income senior residents maintain healthy, safe and sanitary living environment and Activity 2: senior enrichment programming to provide activities for senior residents to maintain mental health.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	94 low- and moderate-income senior households and 75 low- and moderate-income seniors.
	Location Description	City-wide
	Planned Activities	The activities for this project are related to: Activity 1: working in partnership with the Area Office On Aging on the rehabilitation of privately owned, single-family unit homes with construction dollars provided by the Area Office on Aging and Activity 2: to provide senior with enrichment programs such as painting, cooking, computer, music and etc. to maintain mental health.
18	Project Name	Economic and Community Development Institute Inc (ECDI)

	Target Area	Citywide
	Goals Supported	Business Recruitment/Retention Assistance
	Needs Addressed	Econ Dev: Job Creation/Access and Business Asst.
	Funding	CDBG: \$50,000
	Description	To address the unmet need for affordable capital for small businesses that do not have access to traditional financing.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Four (4) businesses assisted
	Location Description	City-wide
	Planned Activities	The project entails establishing a revolving loan fund for eligible small businesses, provide technical assistance and administer the loan.
19	Project Name	Fair Housing Opportunities of Northwest Ohio
	Target Area	Citywide
	Goals Supported	Fair Housing Planning & Services
	Needs Addressed	Fair Housing
	Funding	CDBG: \$150,000
	Description	This project entails activities to ensure that residents, regardless of income, have fair housing choices and further the implementation of the Analysis of Impediments (AI) Action Plan steps towards the elimination of impediments to fair housing choice. (This Fair Housing activity is carried out as part of the Department of Housing and Community Development general program administration).
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	3,507 individuals and families who could potentially be facing housing discrimination will benefit from this activity.
	Location Description	City-wide
	Planned Activities	The administrative activities related to housing discrimination including: <ul style="list-style-type: none"> • Fair Housing Enforcement; • Trainings (for the public and the housing industry); • Dissemination of information at outreach events; • Implementation of action steps identified in the Analysis of Impediments (AI); and, • Land-lord Tenant Education.
20	Project Name	Grace Community Center

	Target Area	Citywide Low to Moderate Income & Slum and Blight
	Goals Supported	Establish and Maintain Community Gardens
	Needs Addressed	Improving Neighborhood Conditions Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$46,609
	Description	The project entails two activities: Activity 1: promote educational enrichment for k-6th graders to sustain or increase grade level growth during summer study and help youth learn positive life skills through social learning strategies; and Activity 2: a garden cooperative which will give families a stake in ownership of the garden beds and will increase access to affordable home-grown vegetables.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Thirty (30) youth will benefit from activity 1 and Sixty-Five (65) persons will benefit from activity in low- and moderate-income areas.
	Location Description	City-wide
	Planned Activities	To promote educational enrichment for k-6th graders to sustain or increase grade level growth during summer study and help youth learn positive life skills through social learning strategies and the garden designed to provide families in low- to moderate-income areas with a variety of vegetables throughout the growing season.
21	Project Name	Historic South Initiative
	Target Area	Old South End
	Goals Supported	Housing Repairs and Rehabilitation
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation
	Funding	CDBG: \$100,000
	Description	The project will assist owners and residents with making repairs and/or rehabilitation of properties located in the Old South End.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	25 low- and moderate-income households will benefit from this activity.
	Location Description	Old South End

	Planned Activities	The repair or rehabilitation of properties located in the Old South End. In addition, partnering with NeighborWorks and/or Maumee Valley Habitat for Humanity for interior and roofing for those residents that are eligible.
22	Project Name	Legal Aid of Western Ohio Inc
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$100,000
	Description	To provide high quality legal services regarding housing issues to low- and moderate-income adults residing within the City of Toledo.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	200 low- and moderate-income persons will benefit from this activity.
	Location Description	City-wide
	Planned Activities	The legal services for this project include the following: <ul style="list-style-type: none"> • Comprehensive Legal Representation; • Defense of eviction and foreclosure cases/secure affordable housing; • Addressing issues with unsuitable living conditions and unscrupulous landlords.
23	Project Name	Lucas County Regional Health District
	Target Area	Citywide Low to Moderate Income & Slum and Blight
	Goals Supported	Code Enforcement & Nuisance Abatement incl. Rental
	Needs Addressed	Improving Neighborhood Conditions
	Funding	CDBG: \$59,660
	Description	The administrative costs associated with proactive inspections for rodent activity and follow-up actions such as citations and court nuisance orders.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	700 households will benefit from this project.
	Location Description	City-wide
	Planned Activities	The administrative activities associated with codes addressing rodent control.
24	Project Name	Lucas Housing Services Corporation
	Target Area	Citywide

	Goals Supported	Housing Repairs and Rehabilitation
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$100,000
	Description	The project entails two activities related to the repair or the rehabilitation to LIHTC units to make units available for purchase by low- and moderate-income households and to provide financial education, counseling and coaching services, employment coaching and services, and income services and support to Lucas Metropolitan Housing (LMH) residents.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Three (3) housing units will be repaired or rehabilitated for purchase by low- and moderate-income households and Thirty (30) individuals or families will receive financial education and/or counseling.
	Location Description	City Forest and North River Homes Areas East Toledo
	Planned Activities	The activities associated with the repair, rehabilitation, and purchase of properties and financial education and/or counseling to LMH residents.
25	Project Name	Martin Luther King Center for the Poor
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$54,000
	Description	To provide grocery items, food supplements, and food boxes to low-income and homeless families, thereby, providing savings to families' budgets.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	825 low- and moderate-income persons will benefit from this project.
	Location Description	City-wide
	Planned Activities	The operational activities related to providing food boxes to low- and moderate-income residents and, as needed, deliver food boxes to senior citizens.
26	Project Name	Maumee Valley Habitat for Humanity
	Target Area	Citywide
	Goals Supported	Housing Repairs and Rehabilitation

	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation
	Funding	CDBG: \$400,000
	Description	This project entails two activities: Activity 1: roof repair/replacement in the focused targeted neighborhoods and Activity 2: roof repair/replacement projects for low- and moderate-income households City-wide.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	33 low- and moderate-income households will benefit from roof repairs/replacements in the targeted neighborhoods and 33 households will benefit from a roof repair/replacement City-wide.
	Location Description	City-wide
	Planned Activities	The activities associated with carrying out roof repairs/replacements for low- and moderate-income families will benefit from this project.
27	Project Name	Neighborhood Health Association of Toledo Inc
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$154,647
	Description	To provide direct medical care through 13 community health centers to low- and moderate-income residents of the City of Toledo. Primary healthcare, preventative healthcare and specialty care will be provided.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	4,750 low- and moderate-income persons will benefit from this project.
	Location Description	City-wide
	Planned Activities	Services associated with physical health needs such as: primary healthcare, preventative healthcare, and specialty care. LMI clients will have access to quality medical care, a full-service pharmacy at Nexus Health Care, care coordination for prescription assistance and other services, community service, specialty care such as cardiology, women's health, and podiatry. Dental services are also accessible through the Neighborhood Health Association (NHA).
28	Project Name	NeighborWorks Toledo Region
	Target Area	Citywide
	Goals Supported	Housing Repairs and Rehabilitation

	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$305,000
	Description	This project entails two activities related to carrying out housing and neighborhood development through homeowner-occupied rehabilitation and improving the quality of life for Toledo residents by fostering housing and financial education.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Low- and moderate-income individuals and families will benefit from the activities undertaken under this project as follows: Activity 1: 50 housing units will be rehabilitated or repaired and Activity 2: 72 individuals or families will receive financial education and/or counseling.
	Location Description	City-wide
	Planned Activities	The activities that are directly associated with the rehabilitation of owner-occupied homes and financial education and/or counseling to low- and moderate-income individuals or households.
29	Project Name	Pathway Inc
	Target Area	Citywide
	Goals Supported	Home Repairs for Seniors and the Disabled
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation Adequate Housing & Services for Other Special Need
	Funding	CDBG: \$400,000
	Description	To provide emergency repairs on owner-occupied homes for very low- to low-income adults aged 62 years or older and the permanently disabled.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	52 households will benefit from this project.
	Location Description	City-wide
	Planned Activities	The activities associated with the rehabilitation of privately owned, single-unit homes.
30	Project Name	Sofia Quintero Art & Cultural Center
	Target Area	Old South End
	Goals Supported	Establish and Maintain Community Gardens

	Needs Addressed	Improving Neighborhood Conditions Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$80,000
	Description	To increase capacity through community gardening, provide educational and life skills development opportunities to youth while promoting public art.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	180 low- and moderate-income residents will benefit from the produce grown in the gardens.
	Location Description	Old South End
	Planned Activities	The activities associated with low- to moderate-income residents benefitting from the produce grown in the community gardens.
31	Project Name	Toledo Design Collective
	Target Area	Citywide
	Goals Supported	Improved Neighborhoods by Comprehensive Planning
	Needs Addressed	Improving Neighborhood Conditions
	Funding	CDBG: \$28,000
	Description	To provide planning and design services to community organizations.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	One (1) organizations will benefit directly from this project.
	Location Description	City-wide
	Planned Activities	The activities associated planning and design services to assist organizations in the community.
32	Project Name	Toledo GROWs
	Target Area	Citywide
	Goals Supported	Establish and Maintain Community Gardens
	Needs Addressed	Improving Neighborhood Conditions Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$46,000
	Description	To increase access to healthy food in low- and moderate-income areas of the City by establishing and maintaining community gardens. This activity will also include the conversion of blighted, vacant lots into beautiful, productive community gardens. Additionally, to work with community agencies to refer individuals needing a supplemental food parcel.
	Target Date	6/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	3,000 persons residing in low- and moderate-income areas will benefit from new or existing community gardens.
	Location Description	City-wide
	Planned Activities	The activities associated with the establishment and maintenance of community gardens such as: technical assistance in project planning, problem solving, volunteer assistance, and gardening education. In addition, coordinate the distribution of free seeds and plants, educational materials, and healthy foods.
33	Project Name	Toledo Seagate Food Bank
	Target Area	Citywide
	Goals Supported	Increase or new public services
	Needs Addressed	Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$60,000
	Description	This project entails two activities: Activity 1: To provide balanced, nutritional food baskets to low- and moderate-income individuals in low- and moderate-income census tracts; and Activity 2: To provide a supplemental food basket to individuals or families affected by the opioid epidemic under the Families in Recovery Staying Together (F.I.R.S.T) program.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	4,449 low and moderate-income unduplicated individuals will be assisted through activity 1 and 2,500 individuals through activity 2.
	Location Description	City-wide
34	Project Name	Aurora Project Inc
	Target Area	Citywide
	Goals Supported	Increase in transitional housing
	Needs Addressed	Adequate Housing & Services for Homeless/At Risk Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$90,000
	Description	To provide Transitional Housing (TH) to homeless persons.
	Target Date	6/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	Twenty-one (21) families (34 women and children) whose head of household is suffering from substance abuse will benefit from this project.
	Location Description	City-wide
	Planned Activities	The activities associated with the operation of a Transitional Housing (TH) facility for homeless persons.
35	Project Name	Family House
	Target Area	Citywide
	Goals Supported	Increase number of emergency shelters
	Needs Addressed	Adequate Housing & Services for Homeless/At Risk Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$56,000
	Description	To provide emergency housing for homeless persons.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	120 families (450 individuals) will benefit from this activity.
	Location Description	City-wide
	Planned Activities	The activities associated with the operation of an Emergency Shelter (ES) for homeless persons.
36	Project Name	Toledo Lucas County Homelessness Board (TLCHB)
	Target Area	Citywide
	Goals Supported	Rapid Re-Housing and Direct Financial Assistance
	Needs Addressed	Adequate Housing & Services for Homeless/At Risk Provide and expand Public (Social) Services - 15%
	Funding	CDBG: \$112,054
	Description	For eligible activities associated with ending homelessness in the city of Toledo.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City-wide

	Planned Activities	The activities associated with the operation of TLCHB which is the lead Continuum of Care (CoC) organization. Activities are related to coordinated assessment, rapid re-housing, direct financial assistance, permanent supportive housing, emergency shelters, transitional housing, and youth homelessness.
37	Project Name	HESG-2022 Homeless Services - ESG
	Target Area	Citywide
	Goals Supported	Coordinated Access for Homelessness
	Needs Addressed	Adequate Housing & Services for Homeless/At Risk
	Funding	ESG: \$638,314
	Description	The provision of services to homeless and those at-risk of homelessness in the community as well as services related to the overall management of the homeless system in the community.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Households will benefit from homeless services provided through the Emergency Solutions Grant (ESG).
	Location Description	City-wide
38	Planned Activities	The activities related to coordinated assessment, rapid re-housing, direct financial assistance, permanent supportive housing, emergency shelters, youth homelessness, Homeless Management Information System (HMIS) and administration of the TLCHB.
	Project Name	Community Center Improvements
	Target Area	Junction/Englewood Garfield /Starr/ Raymer Citywide
	Goals Supported	Improvements to parks and community facilities
	Needs Addressed	Improving Neighborhood Conditions Improve Public Infrastructure for LMI Households
	Funding	CDBG: \$85,785 CDBG: \$614,215 (Carryover)
	Description	Rehabilitation of neighborhood facilities used for social services and recreation in low- to moderate-income areas.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Three (3) community facilities to be rehabilitated.
	Location Description	City-wide

	Planned Activities	Rehabilitation of three neighborhood facilities (St. Martin De Porres, Ironwood Community Arts Center and J. Frank Troy Senior Center) used for social services and recreation in low- to moderate-income areas.
39	Project Name	Police Athletic League (PAL)
	Target Area	Citywide
	Goals Supported	Improvements to parks and community facilities
	Needs Addressed	Improving Neighborhood Conditions Improve Public Infrastructure for LMI Households
	Funding	CDBG: \$600,000 (Carryover)
	Description	To renovate the PAL field into a multi-purpose sports field in one of the City's most under-served areas.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	One (1) public facility
	Location Description	City-wide
	Planned Activities	The activities associated with the renovation of the PAL field into a multi-purpose sports field that includes baseball, soccer or football.
40	Project Name	YMCA of Greater Toledo
	Target Area	Citywide
	Goals Supported	Improvements to parks and community facilities
	Needs Addressed	Improving Neighborhood Conditions Improve Public Infrastructure for LMI Households
	Funding	CDBG: \$200,000 (Carryover)
	Description	The architectural design for the new YMCA.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	One (1) public facility
	Location Description	City-wide
	Planned Activities	The activities associated with creating an architectural design.
41	Project Name	Local Initiatives Support Corporation (LISC) and/or other CDFIs
	Target Area	Citywide
	Goals Supported	Business Recruitment/Retention Assistance
	Needs Addressed	Econ Dev: Job Creation/Access and Business Asst.
	Funding	CDBG: \$500,000 (Carryover)
	Description	To create an Equity and Inclusion Partnership with small businesses.
	Target Date	6/30/2023

	Estimate the number and type of families that will benefit from the proposed activities	50 small businesses
	Location Description	City-wide
	Planned Activities	To provide technical assistance to support small businesses – particularly minorities and women.
42	Project Name	COT Rooftop Program
	Target Area	Citywide
	Goals Supported	Housing Repairs and Rehabilitation
	Needs Addressed	Improving Housing Affordability Improving Neighborhood Conditions Increase Home Repairs and Housing Preservation
	Funding	CDBG: \$300,000
	Description	To provide roof repair or replacements in the City of Toledo.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	Twenty (20) low- and moderate-income households will benefit from a roof repair/replacement.
	Location Description	City-wide
	Planned Activities	The activities associated with carrying out roof repairs/replacements for low- and moderate-income families will be benefit from this project.
43	Project Name	Ironwood Architectural Assessment
	Target Area	Garfield /Starr/ Raymer
	Goals Supported	Improvements to parks and community facilities
	Needs Addressed	Improving Neighborhood Conditions Improve Public Infrastructure for LMI Households
	Funding	CDBG: \$10,000
	Description	To complete an Architectural Assessment.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	One (1) public facility
	Location Description	Garfield/Starr/Raymer
	Planned Activities	The completion of an Architectural Assessment for the rehabilitation of the Ironwood Community Center.

44	Project Name	CDBG Project - TBD
	Target Area	Citywide
	Goals Supported	Business Recruitment/Retention Assistance
	Needs Addressed	Econ Dev: Job Creation/Access and Business Asst.
	Funding	CDBG: \$282,316
	Description	CDBG Program Income and carryover forward funds will be allocated to a project or projects to be determined by the City.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City-wide
	Planned Activities	To be determined.
45	Project Name	Coordinate with other Homeless Related Assistance
	Target Area	Citywide
	Goals Supported	Coordinated Access for Homelessness
	Needs Addressed	Adequate Housing & Services for Homeless/At Risk
	Funding	Continuum of Care: \$4,476,415
	Description	The City of Toledo will coordinate with other funding for homeless related assistance available through the Toledo Lucas County Continuum of Care. These funds are not administered by the City but contribute to homelessness prevention and reduction. Outcomes will be generated by the administrators of the funds.
	Target Date	6/30/2023
	Estimate the number and type of families that will benefit from the proposed activities	N/A
	Location Description	City-wide
	Planned Activities	Coordinate meetings, share data, fund program activities jointly, address policy issues.

AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

In general, some federal grant funded activities such as public services, economic development, and housing rehabilitation and new construction are provided on a Citywide basis to low- and moderate-income (LMI) individuals and households. As well, the City of Toledo (COT) has identified and mapped areas of the City where the LMI population is 51% or more. LMI census tracts are: **8, 9, 10, 11, 12.02, 13.02, 14, 15, 17, 18, 19, 20, 22, 23, 24.01, 24.02, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 39, 40, 42, 46, 47.01, 47.02, 48, 49, 50, 51, 52, 53, 54, 57.01, 59.02, 66, 67, 68, 73.02, 73.03, and 103.**

In addition to Citywide activities, the COT also uses geographic, place-based strategies to reach the goals in the Five-Year Consolidated plan.

Geographic Distribution

Target Area	Percentage of Funds
Junction/Englewood	1
Old South End	1
Garfield /Starr/ Raymer	1
Citywide	94
Low to Moderate Income & Slum and Blight	3

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

National economic conditions continue to affect the revitalization and stabilization of Toledo neighborhoods. Investment will be prioritized to benefit low- and moderate-income individuals, including minorities, seniors, and persons with disabilities. Issues such as an older housing stock, an increase in vacant and deteriorated properties that contribute to blight and lack of economic development opportunities are negatively impacting once thriving neighborhoods.

The City, in adherence to HUD regulations, will allocate at least 70% of its 2020-2024 CDBG entitlement award to programs and activities that directly benefit low- to moderate-income individuals.

Discussion

All projects and activities are designed to meet HUD's National Objective of meeting the needs of low- to moderate-income household, individuals and areas.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The COT provides affordable housing opportunities through various means, including the use of CDBG, HOME, and ESG funds. During the 2022 (48th) PY, the City will use funds to support affordable housing through rental and security deposit assistance, supportive services, construction of new units, acquisition and rehabilitation of existing units, owner-occupied home repair, and permanent housing.

Additionally, specific one-year affordable housing goals will also address the City's fair housing goals identified in the Analysis of Impediments to Fair Housing Choice (AI). The project and program goals as described in the Annual Action Plan target the non-homeless, homeless and households with special needs in the tables below.

One Year Goals for the Number of Households to be Supported	
Homeless	265
Non-Homeless	260
Special-Needs	120
Total	645

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	285
The Production of New Units	25
Rehab of Existing Units	305
Acquisition of Existing Units	30
Total	645

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

The need for safe and affordable housing units for extremely low-, very low- and low-income households continue to be extremely vital. The COT plans to continue exploring additional opportunities that address this need and will identify key initiatives that will aid in meeting this high priority of the City.

AP-60 Public Housing – 91.220(h)

Introduction

Lucas Metropolitan Housing (LMH) will conduct the following actions and activities:

STRATEGIES:

1. Expand the supply of “Housing of Choice” for individuals, families, and special populations.
2. Provide an improved living environment through Public Safety.
3. Promote Self-Sufficiency and Asset Development of assisted LMH households.
4. Ensure equal opportunity and affirmatively furthering fair housing.

ACTIONS:

- a. Developing the next phases of Collingwood Green (CWG) (IV and V) in partnership with Lucas Housing Services Corporation (LHSC). Phase IV and V will provide 40 additional family Townhomes and 75 Senior apartments.
- b. Demolishing the existing Park Hotel site due to major structural deficiencies and redevelop the site into 45 1- and 2-bedroom apartments for Youth Aging out of Foster Care.
- c. Continuing its Asset repositioning strategy through the utilization of Rental Assistance Demonstration (RAD) and other mixed finance tools.
- d. Continue the rolling RFP for Housing Choice Voucher (HCV) program and to leverage its HCV Program to develop Housing of Choice in the City of Toledo and Lucas County.
- e. Continue to develop the Transformation Plan for the Choice Neighborhoods Initiative Planning Grant to redevelop McClinton Nunn Public Housing and the Junction Neighborhood. Will submit for an Implementation grant when available.
- f. Increasing housing choices in high opportunity areas by conducting outreach to potential voucher landlords through symposiums and educational efforts.
- g. Encourage the use of LMH’s Landlord Portal that will allow Landlord’s access to key information including upcoming inspections and current Housing Assistance Payments.
- h. Partnering with other Law enforcement entities including Toledo Police Department and Lucas County Sheriff’s Office.
- i. Expanding the LMH Public Safety Department by adding additional Public Safety Officers.
- j. LMH will be expanding its Family Self Sufficiency (FSS) program and Program Coordinating Committee with the goal in mind to implement a Financial Opportunity Center as an expansion of the FSS program.
- k. Implement ESUSU a program that provides rent reporting to credit bureaus as well as rent relief in the event a resident is unable to pay their rent. ESUSU’s platform enables renters to build financial identity, reach financial stability, and ultimately move towards wealth creation.
- l. LMH is working with Partners to increase the availability of Wi-Fi with the goal to improve connectivity, digital literacy and add devices.
- m. Continue to partner with After-School All-Stars program designed to help children k-12 with tutoring, online academics, assistance with the remote learning experience, daily adjustment, family dynamics, relationship building, and mental and emotional well-being.

- n. LMH conducts Symposiums to educate the community on the various types of HCV programs and to create a dialogue to expand the types and variety of HCV programs needed locally.

Actions planned during the next year to address the needs to public housing

1. Improve the Quality of Life for LMH Public Housing Residents by:
 - a. Continue training that will enhance the skills of the Central Resident Advisory Board (C-RAB) who's responsibilities include advocating for and being the representative voice of LMH residents and implementing resident councils within developments;
 - b. Continue the HUD funded Jobs Plus program which is exclusive to residents of Birmingham Terrace and Ravine Park Village. This is a four-year grant that launched in 2019;
 - c. Provide youth enrichment in partnership with After-School All Stars a program;
 - d. Provide access to food by providing on site commodities, partnering with Connecting Kids to Meals, and the Area Office on Aging.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

- a. LMH will conduct outreach meetings with FSS participants to promote enrollment into the HCV and LHSC Homeownership Programs;
- b. Provide Homeownership Counseling in-house for the community and LMH residents;
- c. LMH's non-profit affiliate received funding through the City of Toledo 's HOME and CDBG programs to support home ownership activities.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not Applicable. The PHA is not designated as troubled.

Discussion

Lucas Metropolitan Housing (LMH) will conduct the additional actions and activities under the following Strategies:

1. Expand the supply of "Housing of Choice" for individuals, families, and special populations.
2. Provide an improved living environment through Public Safety.
3. Promoting Self-Sufficiency and Asset Development of assisted LMH households.
4. Ensuring equal opportunity and affirmatively furthering fair housing.
5. Continue to strategically expand partnerships that will benefit LMH Residents and the Community Improve the Quality of Life for LMH Public Housing Residents.
6. Encourage Public Housing Resident to become more involved in management and participate in homeownership.

ACTIONS

- a. Conducting presentations to the Realtor Association and other Real Estate Organizations promoting the HCV Program.
- b. LMH will continue to monitor and implement a shorter look back period of the criminal history of applicants thereby providing housing opportunities to additional individuals.
- c. Conducting community outreach activities entitled “Operations Play with Youth” and “Candy Kids Operations” that are designed to develop trust and a rapport with our Youth and Residents.
- d. Improving its security cameras systems throughout its Public Housing Portfolio.
- e. Installing new CO detectors and upgrading existing smoke detectors systems throughout its portfolio.
- f. Utilizing Lead Abatement Capital Funds to remediate any identified lead hazards throughout the Public Housing portfolio.
- g. LMH will continue to refine its Business Continuity and Consolidated Action Plan to ensure residents and staff are educated, prepared and informed regarding any agency emergencies or public emergencies.
- h. LMH will continue to seek ways to expand broadband access including helping residents access the Federal Government assistance provided for Wi-Fi access.
- i. LMH continues to work with its partners to review its policies and Admissions and Continued Occupancy Policy to ensure that applicants with criminal histories receive appropriate review.
- j. LMH partners with TLCHB with administering the Community Advisory Council to serve as the new planning body for housing and homelessness services.
- k. LMH is currently working with the TLCHB to administer and distribute over 100 emergency vouchers LMH received from HUD in late 2021.
- l. Continues to partner with the “No Barriers Housing” network.
- m. Continues to serve as the United Way’s Collaborative Impact lead agency for Shelter/Housing Stability which creates community conversations around best practices, partnership opportunities, data collection, and community needs.
- n. LMH continues to develop its Asset Repositioning Strategy to improve existing LMH housing and to add additional “Housing of Choice” needed in the City of Toledo and Lucas County.
- o. LMH Resident meetings will resume after being postponed due to the pandemic. These meetings allow dialogue and exchange of ideas between Management and Residents.
- p. LMH will be partnering with Pathway to ensure Housing Stability of its Public Housing Residents.
- q. LMH is seeking partnerships with developers to provide “Housing of Choice” in high opportunity areas.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The Toledo Lucas County Homelessness Board (TLCHB), in partnership with the Continuum of Care (CoC) partners including the City of Toledo, continues to coordinate local efforts to reduce and end homelessness. TLCHB maintains an organizational partnership with the regional housing authority, Lucas Metropolitan Housing (LMH), to more effectively achieve this mission in our community.

TLCHB's partnership with LMH has resulted in innovations in local homelessness service delivery including the CoC's Housing First model, "No Barriers Housing", which aims to incorporate HUD best practices into the CoC's services as well as house populations prioritized by the strategic plan. In 2022, TLCHB and partners will be formalizing the system-wide model's processes and systems, including the coordinated entry system.

In addition, TLCHB and CoC partners continue to engage with a more inclusive continuum body - the Community Advisory Council (CAC). The CAC includes traditional homeless and housing service providers as well as additional community partners from other provider systems that impact and serve homeless individuals (United Way of Great Toledo's 2-1-1 center, local schools, mental health and recovery services board, children services, medical providers, workforce providers, and financial health providers, etc.). TLCHB and CoC partners will continue to broaden the CAC, deepen its work, and formalize its processes and outreach in 2022.

The TLCHB and partners continue to utilize the Coordinated Entry (CE) data to measure progress towards ending homelessness. In addition, TLCHB and partners continue to utilize specialized case management and community outreach services for unsheltered homeless individuals through Neighborhood Properties, Inc. (NPI)'s Projects for Assistance in Transition from Homelessness (PATH) program.

The TLCHB and partners will be utilizing these new and existing structures to successfully implement this Action Plan's goals for homeless individuals and for other special needs activities.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

TLCHB and its CoC and CAC partners will coordinate community outreach activities to homeless individuals among various sectors, including education, mental health and addiction, health, criminal justice and corrections, social services, housing, workforce, and financial health. Specialized attention will include coordinating directly with United Way of Greater Toledo's 2-1-1 center and efforts are being made to implement a Housing Problem Solving program to bolster and support 211's CE efforts.

In addition, specialized case management services through the PATH program will be utilized for unsheltered and chronically homeless individuals. PATH's Community Outreach Specialists are trained to identify and engage unsheltered and chronically homeless individuals and connect them to needed services and Coordinated Entry for housing options. In addition, the PATH program provides intensive client-based specialized case management services that leads to improved outcomes for this population.

Addressing the emergency shelter and transitional housing needs of homeless persons

TLCHB and its CoC partners, utilizing the unified and comprehensive homelessness services delivery system-wide model of Housing First, will increase coordination and access to emergency shelter and transition housing services for homeless individuals. TLCHB regularly coordinates with its Coordinated Entry system, as well as local emergency shelters and transitional houses to maximize resources and ensure efficient and effective coordination. Where there is limited capacity in CoC shelters, our coordinated entry system shares other shelter resources with individuals in need. TLCHB will be reviewing and updating all policies related to CE access points in 2022 in a goal to streamline processes, eliminate gaps, and ensure effective participation among all service providers.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

The TLCHB's organizational partnership with LMH, the utilization of the unified and comprehensive services delivery system-wide model of Housing First, and the continued use of the evidence-based tool Service Prioritization Decision Assistance Tool (SPDAT) will support implementation of this goal. Special assistance will be provided by TLCHB and CoC partners for chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth. This process, including both the usage of the SPDAT tool and case conferencing will be utilized by TLCHB and CoC partners to shorten the period of time individuals and families experience homelessness and get sheltered or in housing options.

The SPDAT program allows for coordinated assessment for prioritization and placement of clients in appropriate housing programs. This tool provides our community a comprehensive method to assist homeless individuals and families for shelter placement and permanent housing referrals and placements. A continuous review of this tool will provide TLCHB and the CoC partners with the latest and most accurate approach to assessing homeless individuals and families based on their individualized needs.

Coordination of access to affordable housing will be increased with the organizational partnership with LMH. This partnership with LMH will both increase access to affordable housing programs and also address evictions as an entry point for homelessness for individuals and families. TLCHB also has a formal partnership with The Fair Housing Center, which is also partnering on addressing evictions by creating a Landlord-Tenant Mediation program to minimize and mitigate potential evictions within the system.

Additionally, TLCHB has begun or will begin new partnerships with CoC partners to expand rental subsidies and assistance programs in 2022 to maximize the number of individuals being transitioned into permanent housing. TLCHB has also given CoC priority status to two pending permanent supportive housing developments being proposed this year.

Homeless individuals and families in re-housing programs are also connected to financial health and workforce development programs, education, social services, health, and mental health and addiction services, and other programs based on individualized needs. Additionally, through the Housing First process, case managers will be assigned to individuals to support them after moving in to new housing. They will provide access to mental health support services, physical health support services, furniture, other necessities, and payee services in an effort to prevent reentry into homelessness.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

TLCHB and its CoC partners will also utilize the unified and comprehensive homelessness services delivery system-wide model of Housing First to achieve this goal, as well as the new organizational partnership with LMH. Further, the broadening of the CoC continuum to include the more cross-sector and inclusive Community Advisory Council (CAC), connecting non-homeless and housing sectors more deeply to the CoC, will assist us in achieving this goal. TLCHB's deepening partnership with United Way of Greater Toledo's 2-1-1 Center will also support achieving this goal.

Special attention for this goal will be paid to extremely low-income individuals and families, to those receiving assistance from CoC partners including the CAC, and to individuals being discharged from publicly-funded institutions and systems of care. These publicly-funded institutions and systems of care include health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions. TLCHB has begun a formal partnership with Lucas County Children Services in 2022 to support transition aged youth in this effort. It has also given priority status to TASC for development of Permanent Supportive Housing units to support individuals with criminal histories and/or exiting a publicly-funded institution.

Discussion

In the last two years, TLCHB and the CoC has undergone several instrumental and innovative organizational and system delivery changes, including Housing First, that will achieve improved outcomes for homelessness in our community. It has implemented many changes, rebuilt programs and capacity and worked to remain the lead agency in support of eliminating homelessness in our community. TLCHB has and will continue to act on behalf of all homeless service providers to provide up to date, responsive leadership to address the ongoing COVID pandemic.

PY 2022, will be focused on continuing to restructure our Housing First initiative so that it is fully implemented in all programs, continuing to expand and deepen partnerships, and updating key performance indicators to further drive and predict trends to better service this population. These goals are achievable and we look forward to improving outcomes for homeless individuals and families, or those at-risk of becoming homeless, in the coming year.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Jurisdictions that receive federal dollars, directly or indirectly, are required by the Department of Housing and Urban Development to complete an Analysis of Impediments (AI). The Analysis of Impediments process is prescribed and monitored by the federal Department of Housing and Urban Development and the State of Ohio's Department of Development. Specifically, to receive HUD Community Planning and Development formula grants, a jurisdiction must (i) certify its commitment to actively further fair housing choice; (ii) maintain fair housing records; and (iii) conduct an Analysis of Impediments to Fair Housing Choice.

An AI is a comprehensive review of barriers that inhibit residents from acquiring the housing of their choice based on federal, state, and local characteristics: race, color, national origin, religion, sex, familial status, disability, military status, sexual orientation, gender identity, immigration status, and source of income. The examination looks at issues in our community through a fair housing lens, including: community characteristics and demographics; income and poverty; transportation; employment; and public and private policies that impact protected groups and vulnerable populations, such as zoning, code enforcement, and real estate practices, among others.

The Fair Housing Center conducted an Analysis of Impediments to identify the fair housing barriers that will be addressed from 2020-2025. Emerging, persisting, and worsening impediments discussed in this document include the continuing effects of redlining and other forms of systemic discrimination; the indicators of low opportunity and health risks in neighborhoods of color; and the corresponding lack of housing mobility among occupants in neighborhoods of color. Other significant housing concerns are also illustrated, such as lead hazards; barriers faced by persons reentering the community after incarceration; and the emerging issue of discrimination based on source of income. The text also calls for affirmative programming and counseling to improve and inform housing choice and highlights the need for legislative changes to ensure the effectiveness of this programming.

The Analysis of Impediments is used as a catalyst for the City to develop and implement a Fair Housing Action Plan (FHAP). The Fair Housing Action Plan will identify strategies that will be implemented in order to curtail and/or eliminate the impediments identified in the Analysis. The Analysis drives the Fair Housing Action Plan, which is the guiding document outlining the concrete steps that the City and its partners will take to address the impediments.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

I. Housing Opportunity

Criminal History Screening

- Adopt local policies such as “ban the box” to address discrimination based on criminal history screening
 - City of Toledo, The Fair Housing Center
- Set aside affordable housing opportunities, both vouchers and hard units for reentry population
 - Lucas Metropolitan Housing, Other subsidized housing providers
- Encourage or require housing providers to comply with HUD’s guidance on criminal history screening
 - City of Toledo, The Fair Housing Center

Homeownership: Lending and Insurance

- Encourage lenders to provide appropriate credit opportunities in minority and low-income neighborhoods
 - The Fair Housing Center with support from the City of Toledo
- Address insurance discrimination issues
 - The Fair Housing Center with support from the City of Toledo
- Coordinate with local banks to create a loan product to address credit needs in low-income and minority neighborhoods. Examples of this work are available in the Detroit area.
 - The Fair Housing Center with Support from the City of Toledo

Accessibility for Persons with Disabilities

- Enforce current visit-ability and accessibility rules
 - City of Toledo, The Fair Housing Center
- Encourage developers to increase accessibility whenever they benefit from public funds or tax incentives in some way
 - City of Toledo

Source of Income Discrimination

- Enact source of income protections like those currently in committee before City Council
 - City of Toledo
- Coordinate with Lucas Metropolitan Housing and landlords to address issues with vouchers

Enforce fair housing protections

- Conduct intakes and investigations in response to allegations of housing discrimination and address violations of the FHA by filing complaints and/or lawsuits where appropriate
 - The Fair Housing Center with support from the City of Toledo

Increase awareness of fair housing rights and responsibilities

- Engage in education and outreach activities including conducting trainings and presentations, placing advertisements, distributing educational materials, participating in outreach events, and posting content on social media
 - The Fair Housing Center with support from the City of Toledo

Voucher Mobility

- Lucas Metropolitan Housing should adopt policies and practices consistent with the Poverty Race Research Action Council's recommendations
 - Lucas Metropolitan Housing

Land Use and Zoning

- Adopt changes to policies and practices to address the identified impediments
 - The City of Toledo with support from the Fair Housing Center

LGBTQIA+

- Adopt changes to policies and practices to address the identified impediments
 - The City of Toledo with support from the Fair Housing Center

Homelessness and affordable housing

- Coordinate with partners and other local government entities to create affordable housing opportunities and move forward with the Housing First initiative
 - City of Toledo

II. Housing Stability**Housing Conditions**

- Adopt changes to policies and practices to address the identified impediments
 - The City of Toledo with support from the Fair Housing Center and other community partners

Public transportation

- Lead efforts to adopt and expand county-wide transportation services
 - The City of Toledo with support from other local governments and other agencies

Impediments in Rental Housing

- Address the eviction crisis in Toledo
- Adopt changes to policies and practices to address the identified impediments
 - The City of Toledo with support from other local governments and other agencies

Access to water services

- Pursue appropriate policy and practice changes through the newly formed committee to be coordinated with the City of Toledo's Department of Public Utilities
 - The City of Toledo with support from other local governments and other agencies

Discussion:

Homelessness disparately impacts minority residents. However, opportunities are available to build new affordable housing to reduce homelessness as an impediment to Fair Housing.

- Directing more discretionary resources toward affordable housing

Discretionary funding sources, such as HOME and CDBG, should be evaluated to determine if a larger portion of those funds can be directed toward the development of affordable housing in the Toledo area.

Development of new housing resources must be cognizant of whether the location of the development will truly provide for access to transportation and other resources necessary to help the residents succeed.

- Supporting the new Housing First "No Barriers Housing" Initiative

A Housing First initiative is moving forward in the Toledo area. Public policy and available public resources should be directed to support this effort.

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Toledo is committed to meeting the needs of the underserved through program administration and in collaboration with its community partners. Through the programs offered by community partners and other local agencies, the City seeks to meet the needs of the underserved by creating and maintaining affordable housing, reducing lead-based paint hazards and reducing the number of families in poverty.

The City will continue to pursue opportunities to develop partnerships in all sectors of the community. The DHCD, through mandatory quarterly trainings offered to CDBG and ESG-funded agencies, expands knowledge of community agencies and resources. Additionally, speakers from local organizations are invited to share their expertise and experiences with the City's partners. The objective being to foster networking and information sharing to ensure better coordination of community services and efforts.

Actions planned to address obstacles to meeting underserved needs

With the use of CDBG, HOME and ESG funding the COT together with non-profit agencies, quasi-government agencies and other local agencies impact programs and/or services that address the needs of the underserved populations in the City of Toledo.

Partnering with The Fair Housing Center (TFHC), a 2020 Analysis of Impediments (AI) was completed. The AI includes action steps for the removal of fair housing obstacles in its Fair Housing Plan. The COT and TFHC will collaborate in the implementation of the action steps outlined in the Fair Housing Plan, in collaboration with other community partners.

Actions planned to foster and maintain affordable housing

The COT will use various initiatives, as well as HOME, HOME-ARP, ARPA, and CDBG funds, to maintain and foster affordable housing. The goals identified in the Strategic Plan and the Action Plan include the construction and acquisition of affordable homes, rehabilitation of existing housing stock, home-buyer assistance, home repair programs for elderly and disabled, and housing services for non-homeless special needs populations. The goals of the Annual Action Plan also included funding to increase the capacity of local non-profit community development corporations to develop affordable housing and/or attract larger for-profit developers to develop low-income housing tax credit rental units.

The COT will also work with partners and policy makers to increase rental housing through HOME-ARP funding in providing GAP financing for 9% and 4% tax credit. The COT engaged Root Policy to develop the HOME-ARP allocation Plan which will include contributions from key stakeholders in the City and County. This effort continues to support one of the housing strategy goals, which is to increase access to affordable housing opportunities within the City via new construction and/or rehabilitation of single- and multi-family units.

Also, the COT remains an active member of the Year 16 Initiative which is seeking to preserve the affordability of over 700 single family low-income housing tax credit financed units working along with local PHA, lenders, and intermediaries. The COT plans to work with a local university to determine the level of foreclosures including foreclosed homes and those at risk of foreclosure. The data will be used to determine the need for a foreclosure counseling program during the Consolidated Plan period.

Actions planned to reduce lead-based paint hazards

The City of Toledo (COT) continues its commitment to providing lead-safe, decent, safe and sanitary housing for eligible families. This effort uses a highly coordinated network consisting of private health officials, community development corporations, local public housing authority, social service agencies, and other City departments. The effort targets central City neighborhoods where low-income families occupy approximately two of every three residential units and the concentration of pre- 1978 structures containing lead paint is estimated to exceed 80 percent.

The Department of Housing and Community Development (DHCD) administers a Lead-Based Paint Hazard Control Grant program (OHLHD0453-20) received from the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH). The \$5.7 million grant is utilized to provide financial assistance to property owners to help control lead paint hazards in both owner-occupied and rental residential units within the City of Toledo. The initial 42-month period of performance for the grant began 01/04/2021 and concludes 06/30/2024.

Over the life of OHLHD0453-20, a 42-month grant period, the DHCD has proposed to complete 175 Lead Inspection Risk Assessments, and make 175 residential units in the City of Toledo lead-safe. The DHCD has benchmarked the completion of 65 Lead Inspection Risk Assessments and 76 residential units made lead safe under OHLHB0636-20 during the 2022-2023 the Action Plan (July 1, 2022 - June 30, 2023).

The DHCD also received funding through a 3-year contract with the local health department to utilize BP-Husky settlement funds to make 40 units lead safe. The contract began on 05/01/2021 and will continue up to 5/1/2024. It is anticipated that approximately 13 additional units funded through this source will be made lead safe during this stated action plan period.

Additional multi-year funding was received from the OLHCHH to pilot a cooperation demonstration between the City's Lead Hazard Reduction grant programs and NeighborWorks Weatherization program. The award provided \$1,000,000.00 to make 40 units lead safe along with air quality restoration. The period of performance runs from 07/29/2021 - 07/28/2024. It is anticipated that 30 Lead Inspection Risk Assessments will be performed and 30 residential units made lead safe under this grant during the 2022-2023 the Action Plan year.

The DHCD also receives funds through the Ohio Department of Health's (ODH) Medicaid State Children's Health Insurance Program (SCHIP). The funding period runs from July 1st - June 30th and is re-awarded on an annual basis. Typically, the DHCD Receives \$500,000.00 to make up to 20 units lead safe however notice of next year's funding is usually not provided until May or June of the previous funding year.

Lead-based paint hazard control methods for all of the DHCD's lead programs include the utilization of low-level interventions, interim controls and partial component abatement. Abatement is the DHCD's preferred method in addressing paint surfaces. The program does not perform full abatement but rather the replacement of specific components and systems. Units are made lead-safe but not lead free.

Actions planned to reduce the number of poverty-level families

The goals of the Consolidated Plan and this Action Plan are aimed at reducing the number of poverty-level residents or families in Toledo. The Department of Housing and Community Development engages in housing and community development programs that assist residents or families living at the poverty level. Housing programs are planned for a positive overall effect on households in the following areas: economic development; family stabilization; health improvement; homeownership; and community growth.

Actions planned to develop institutional structure

The Department of Housing and Community Development manages all aspects of the HUD grant programs and recognizes the need to maintain a high level of coordination on projects involving other City departments and/or organizations. This collaboration assures an efficient use of resources and optimal accomplishments. The COT will continue to coordinate efforts with partners, including:

- Toledo - Lucas County Homelessness Board (TLCHB)
- Toledo - Lucas County Plan Commission
- United Way of Greater Toledo
- Lucas Metropolitan Housing (LMH)
- Mental Health and Recovery Services Board of Lucas County
- Lucas County Board of Developmental Disabilities
- Ohio Means Jobs/Lucas County
- Lucas County Land Reutilization Corporation (Land Bank)
- Toledo - Lucas County Health Department
- Toledo - Lucas County Port Authority

Each of the City of Toledo's partners brings specialized service components and experience. A continued commitment to these partnerships and collaborations is critical in achieving the desired outcomes for the community. Many relationships exist consisting of the business community, faith-based organizations, public service entities, housing providers, foundations, and other community organizations that advocate on behalf of those in need. Increased communication with all community stakeholders will continue.

Actions planned to enhance coordination between public and private housing and social service agencies

The COT will continue to work with a broad cross-section of public, private, faith-based, and community organizations to identify the needs of its residents. By continuing to collaborate with the CoC and the community, the City will continue to streamline the actions of public service agencies to improve the lives of all persons in Toledo. These groups address a broad range of needs for families including homelessness, workforce development, and community health.

Regarding public housing, LMH will be expanding its Family Self Sufficiency (FSS) program and Program Coordinating Committee with the goal in mind to implement a Financial Opportunity Center as an expansion of the FSS program. LMH is partnering with LISC and NeighborWorks Toledo to implement a pilot program that will incorporate LMH's FSS services, LISC and NeighborWorks Financial Opportunity Center (FOC) Model, and ESUSU a program that provides rent reporting to credit bureaus as well as rent relief in the event a resident is unable to pay their rent. ESUSU's platform enables renters to build financial identity, reach financial stability, and ultimately move towards wealth creation. Furthermore, LMH, through key staff members, will also serve on various other committees throughout Toledo and surrounding areas, which ensures LMH maintains the pulse of the activities in these areas.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

The COT uses CDBG and HOME funds in support for a variety of housing and community development needs and services. ESG is used for shelter operations, homelessness prevention, and rapid rehousing. This section shows information on program specific requirements for the Community Development Block Grant, HOME and Emergency Solutions Grant (ESG) programs.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	80.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The COT does not utilize any other forms of investment other than those noted in CFR 92.205.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

Recapture Provision

The COT uses the Recapture Provision to ensure affordability for all homebuyer programs when a Direct Subsidy is provided to the homebuyer to purchase the property. A Direct Subsidy includes down payment, closing costs and other assistance to the homebuyer that reduced the purchase price from the fair market value to an affordable price.

If the homebuyer desires to sell the house and notifies the City within the affordability period, based upon the Direct Subsidy provided to the homebuyer, the City will use recapture provisions to mitigate noncompliance based on the prorated recapture formula below. The amount recaptured by the City cannot exceed what is available from net proceeds. Net proceeds are defined as the sales price minus superior loan repayments (other than HOME funds) and any closing costs.

Recapture Formula

To determine the pro-rata amount recaptured by the City:

- Divide the number of months the homebuyer occupied the home by the affordability period (in months),
- Multiply the resulting figure by the total amount of direct HOME subsidy originally provided to the homebuyer.

NOTE: Development Gap Subsidies (i.e., the difference between the cost of producing the unit and the fair market value of the unit) are not subject to recapture as the homebuyer does not realize a direct benefit from these funds.

Resale Provision

For properties that receive HOME development subsidies only, and there is no Direct Assistance to the homebuyer, the resale requirements below will apply if the home is sold during the affordability period:

- The new purchaser must be a low-income household with income at or below 80% AMI.
- The household income must be verified by the City. Income verification process and contact information is included in the Homebuyer Written Agreement.

- The property must be the family's principal residence and the new purchaser agrees to assume the remainder of the original affordability period.
- Fair return will be measured by the percentage change in the Consumer Price Index over the ownership period.
- The original homebuyer, now the home seller, must receive a "Fair Return" on investment, as defined by the City.
- The basis for calculating fair return will include a return on 1) the HOME-assisted buyer's original investment, plus 2) capital improvements made by the original buyer based on actual costs of improvements as documented by homeowner's receipts.
- The improvements include window and roof replacements; electrical and plumbing system upgrades; infrastructure improvements; kitchen and bathroom remodels; basement finishing and energy efficient upgrades.
- In some instances, it may be necessary for the City to provide HOME assistance to the subsequent purchaser to ensure that the original buyer receives a fair return and the unit is affordable to the low-income population, as defined.
- The Homebuyer Agreement must also include a provision of first right of refusal for the City to purchase the affordable unit if an eligible buyer cannot be found in a reasonable time frame.

To maintain continued affordability of the property throughout its affordability period, the City will ensure the home is affordable to LMI homebuyers at time of resale. The targeted population of such buyers will include households with incomes of 60%-80% AMI paying no more than 30% of gross income for principal, interest, property taxes, homeownership association dues and insurance. If the price that provides a fair return to the initial homebuyer is too high to be affordable for the subsequent LMI buyer to purchase the property, the City at its sole discretion, may provide HOME assistance as a direct subsidy to the subsequent buyer, thereby imposing a new affordability period and subjecting the assistance to the recapture provision.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:
 - The City enforces the recapture provision with a Homebuyer Agreement and Restrictive Covenant recorded in the land records of the City of Toledo.
 - The City enforces the resale provision with a Homebuyer Agreement and Restrictive Covenant recorded in the land records of the City of Toledo.

Foreclosure

As provided in 24 CFR Part 92.254(a)(5)(i)(A), "affordability restrictions may terminate upon occurrence of any of the following termination events: foreclosure, transfer in lieu of foreclosure or assignment of an FHA insured mortgage to HUD. The City may use purchase options, rights of first refusal or other preemptive rights to purchase the housing before foreclosure to preserve affordability. The affordability restrictions shall be revived according to the original terms if, during the original affordability period, the owner of record before the termination event, obtains an ownership interest in the housing."

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

HOME funds will not be used to refinance existing debt secured by multifamily housing.

**Emergency Solutions Grant (ESG)
Reference 91.220(I)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

Written standards are contained within the four documents listed below:

- OH-501 Toledo/Lucas County CoC Written Standards
- Coordinated Entry Referral Process
- Collaborative Governance of Coordinated Assessment
- Centralized Approach to Coordinated Access/Entry

See ESG Attachments for these documents.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

The TLCHB, the local CoC governance body, in collaboration with the COT DHCD and based on community support, adopted a centralized approach for coordinated entry in August 2012 as its comprehensive collaborative delivery system of all publicly funded homeless services.

Coordinated Entry (CE) implemented across the community with various functions staged at logical and physical points. United Way of Great Toledo's 2-1-1 hosts the CE project, which is the coordinated entry point for all persons entering the homeless system. The CE performs both prevention and diversion, and when necessary refers, to emergency shelters and/or outreach workers. It should be noted that emergency shelters do not turn away walk-ins or simply refer them to the CE, but engage them in an initial screening to find a brief resolution (diversion) that does not result in emergency stay, if possible. If diversion does not exist, the shelter will provide accommodations to the household to connect to CE by phone and until subsequent next steps (which may or may not include assignment to the particular agency) are identified.

Emergency shelters, outreach workers, and other trained individuals are performing the Housing Assessment, which as of 2014 is the Service Prioritization Decision Assistance Tool (SPDAT). It helps identify which clients should receive what type of housing assistance intervention, and assist in determining the intensity of case management services. The TLCHB upgraded to the newest updated version of SPDAT in 2017.

The SPDAT Score, along with case manager recommendations and other factors, will be taken into consideration when forwarded to the referral specialist, who is currently the Executive Director at TLCHB. The information is used to create a prioritization list, also called the community list, which is used to make referrals to Permanent Housing projects (Rapid Re-Housing and Permanent Supportive Housing).

Governance of our CE system has multiple facets. The “Coordinated Assessment Collaborative Governance Policy” outlines the procedural aspects of monitoring the CE system. The members of the Continuum of Care (CoC) play an integral role in this process. Participation in the CoC via the Community Advisory Council is agreed to formal membership with all publicly-funded organizations required to participate; we encourage and have cultivated a wide array of non-funded community members that participate as an elective. Assessment and assignment of Rapid Re-Housing stabilization services and short-term direct financial assistance were initiated through this approach as a direct result of the success of the Homeless Prevention and Rapid Re-Housing Program. Shelters, Rapid Re-Housing stabilization services and medium-term direct financial assistance joined in February 2013. Transitional and Permanent Supportive Housing were added in Spring 2013. Connecting households who are experiencing homelessness to a single, centralized point for Screening and Assessment/Assignment for Diversion, Homeless Prevention, and Re-Housing services were deemed the “best fit” for the Toledo community because of the results evidenced through the HPRP.

Through the Community Advisory Council, comprised of all funded homeless service providers and members of the TLCHB, United Way of Greater Toledo and the DHCD, as well as other community organizations with tangential goals and services, participants have the opportunity and responsibility to include the design and evaluation of CE and provide feedback on the cases being referred to them.

If for any reason a provider determines that a referred case is ineligible or inappropriate for their programs, CE and said provider work jointly to make a more appropriate referral. Due to local community needs and limited funding, the COT and the TLCHB do not fund Homeless Prevention activities at this time.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The TLCHB, in partnership with the DHCD, established a timeline that included the following:

- A Citizens Review Committee (CRC) comprised of community representatives is identified, recruited, trained, and engaged in determining application priorities, process, scoring, and selection.
- A mandatory application training and distribution meeting that is widely publicized, including direct invitation to current grantees and providers within the Toledo Area Alliance to End Homelessness (TAAEH).
- Completed applications are submitted in a timely fashion that are reviewed, ranked, and recommend (or not) for funding.
- The TLCHB Board of Directors votes on funding recommendations to be submitted to the DHCD.
- Recommendations are vetted and reviewed by the TLCHB and the DHCD for final selection and recommendations to the Mayor of Toledo and City Council.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

A written obligation within third-party contracts with TLCHB and the DHCD provides guidance to achieve this expectation and is monitored by both TLCHB and DHCD. TLCHB will meet this obligation either through board appointment from the COT or as an elected director. Recommendations and/or nominations from the constituency are preferred. The nature of TLCHB CoC/ESG planning oversight work gives ample opportunity to engage those experiencing homelessness and/or those who have recently experienced homelessness toward the end of involving them in decision-making processes, including serving on standing committees and focus groups. ESG-funded agencies are required to have a formerly homeless representative on their boards.

5. Describe performance standards for evaluating ESG.

The local CoC established revised performance standards for funded agencies in November 2016. Not all program types have recommended targets for each performance indicator. Some program types have recommended targets for special populations instead of, or in addition to, overall targets. This is in concert with HUD's Interim Rule, which calls for "performance targets appropriate for population and program type." Targets are segmented according to the National Alliance to End Homelessness Rapid Re-Housing Triage Tool, which rates three areas of barriers to gaining and obtaining housing. Recommended targets are listed by program type for each indicator in the Key Performance indicator list.

The performance indicators are consistent regardless of funding sources. Standards established by the TLCHB for emergency shelter, transitional housing, homeless prevention and rapid re-housing activities are applicable to evaluating ESG activities.

In the Integrated Disbursement and Information System (IDIS), HUD's reporting computerized system; the performance objectives and outcomes are already predetermined based on the activity type/category. Each category has subcategories in IDIS. The grantee may not choose their performance objectives and outcomes; applicable objectives and outcomes as established in IDIS are as follows:

HESG Activity Category	Performance Objective	Performance Outcomes
Prevention	Provide Decent Affordable Housing	Affordability
HMIS	N/A	N/A
Rapid Re-Housing	Provide Decent Affordable Housing	Affordability
Administration	N/A	N/A
Shelter	Create Suitable Living Environment	Availability/Accessibility

The COT is not funding street outreach activities through its ESG funds. Please refer to AP-65 of this Action Plan for existing outreach and assessment activities in the COT.

ATTACHMENTS

CITIZEN PARTICIPATION

1st VIRTUAL PUBLIC HEARING SUMMARY

DRAFT 2022-2023 ONE-YEAR ACTION PLAN

March 24, 2022, 5:30 p.m.

A public notice was posted on electronic media and published in local newspapers announcing the virtual public hearing. Due to the COVID-19 Pandemic, the public hearing was held virtually and was accessible to the public through live streaming. Those attending were given the opportunity to ask questions and provide comments.

Rosalyn Clemens, Director, City of Toledo, Department of Housing and Community Development (DHCD), began by welcoming everyone to the 1st Draft 2022-2023 One-Year Action Plan virtual public hearing. Also joining Director Clemens from the Department of Housing and Community Development were Bonita Bonds, Commissioner of Administrative Services, Tiffanie McNair, Commissioner of Housing, and Monica Brown, Administrative Analyst IV.

Director Clemens explained that the U.S. Department of Housing and Urban Development (HUD) requires the City of Toledo to prepare an Action Plan each year to outline and define the programs and actions that the City will undertake using the federal entitlement dollars it receives. This presentation was put together to inform and provide an overview of the programs and actions proposed for the 2022-2023 program year.

Commissioner Bonds provided a history about how the City gets to the funding recommendations and what HUD requires the City to do to get to the funding recommendations. Commissioner Bonds explained that, currently, the City has a Consolidated Plan, which is a five-year strategic plan that runs from 2020-2024. This plan outlines the priorities that the City will undertake throughout the next five years. Those priorities are established by community surveys and a steering committee comprised of people throughout the community and from various sectors of the community. There are also focus groups that work very closely in certain areas of the city that are considered some of the experts in different facets of the community. The Consolidated Plan provides a five-year roadmap on how the City will implement its Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) allocations, as well as its Emergency Solutions Grant (ESG) to address homelessness.

Commissioner Bonds further explained that the Consolidated Plan is a required five-year plan, which includes an assessment of affordable housing, community development, as well as market needs. From the data that is received in comprising that information, the City is able to establish priorities that it can follow throughout that five-year plan. Each year within those five years, the City is required by HUD to provide a one-year plan. Throughout those five years, the City needs to tell HUD what activities and projects it will undertake that will address the priorities and the goals that were established for the next five years. This is a required annual action plan, which identifies projects and performance measures that are going to be implemented with the community's annual allocation of HUD funding. The City also uses some of their carryover dollars to carry out some of those priorities and goals.

The projects included in the Action Plan support the City's needs that have been identified in the Five-Year Plan. In addition, if there is a gap in service or a need that needs to be met in the community that has not been identified in the Five-Year Plan, the City has the opportunity to do a substantial amendment to the Five-Year Plan, which means it can include another priority to address a need that was unforeseen at that time, but has come up in the community and needs to be addressed. The City is able to amend its Five-Year Plan and Annual Action Plan as a substantial amendment to include additional priorities or goals.

For the current plan, there are nine priorities. Those priorities include 1) improving housing affordability; 2) improving neighborhood conditions; 3) increasing home repairs and housing preservation; 4) economic development, including job creation, access to resources for businesses, and business assistance; 5) providing adequate housing and services for the homeless population and at-risk citizens; 6) providing adequate housing and services for other special needs populations; 7) providing and expanding public services, including homelessness, soup kitchens, and medical services; 8) fair housing; and 9) improving public infrastructure for low- to moderate-income areas and households.

Throughout the five years and annual year, the City is required to perform activities that will address and meet at least one HUD national objective. The national objectives include 1) benefit to low- and-moderate individuals and/or areas, 2) elimination of slum and blight in the community, and 3) address an urgent need. In addition, the goals established in this plan must address one of HUD's objectives and outcomes. HUD objectives are 1) improve the suitable living environment, 2) decent housing, and 3) economic opportunities. The outcomes are 1) improve availability/accessibility, 2) improve affordability, and 3) improve sustainability.

The City also submits a report to HUD that evaluates its performance on the activities that were performed during the program year. As a recipient of CDBG, HOME, and ESG, the City is required to submit an end-of-the-year report. This report, known as the Consolidated Annual Performance and Evaluation Performance Report (CAPER), tells HUD how well the City carried out the actions that were undertaken during the program year. For Program Year 2021-2022, the CAPER will be submitted in September, 2022. The City is happy to report that it had been notified by HUD that the CAPER, submitted for Program Year 2020-2021, had no issues and the City had done an outstanding job of carrying out its plan. As noted in the 2020-2021 CAPER, the City had met the priorities and objectives that had been identified so far in the Five-Year Plan.

The CAPER provides details of how CDBG, HOME, and ESG funds continue to assist in meeting the needs of low- to moderate-income people in the city through activities, including feeding programs, housing programs, health services, as well as other activities. HOME dollars are directed towards down-payment assistance, tenant-based rental assistance (TBRA), owner-occupied rehab and rental housing units, and special projects, such as multi-family and scattered-site rehabilitation projects. The DHCD continues to work with the Toledo Lucas County Homelessness Board (TLCHB) to address efforts towards homelessness and eliminating homelessness in the city.

Ms. Brown provided an overview of the entitlement funding application process and the timeline. Ms. Brown explained that at the beginning of the application process, the City completes a public notice. The first public notice, published in November 2021, announced the mandatory application packet pickup on January 14, 2022. On January 10, 2022, the City sent out a press release from the Mayor's office, which also announced the mandatory application packet pickup. On January 14, 2022, all applicants picked up their applications and had until February 11, 2022 to submit their applications. All applications were submitted through the City's online system, ZoomGrants. All applications were required to be submitted by February 11, 2022, at 4:45 p.m. On February 28, 2022, the Department conducted an application interview process with the Citizens Review Committee (CRC) for the Homeless Service Providers, which afforded agencies the opportunity for an interview regarding their application. On March 1, 2, and 3, 2022, interviews were held for the Non-Homeless Service Providers with the CRC. In March, 2022, a second public notice was published announcing the availability of the Draft 2022-2023 Action Plan and the 30-day comment period. A press release was also sent by the Mayor's office announcing the availability on March 8, 2022. All public notices are published in the City's local newspapers, including *The Blade*, *The Sojourner's Truth* and *The Toledo Journal* (minority newspapers), and *La Prensa* (Hispanic newspaper).

The City's citizen review process is comprehensive and includes a detailed plan that is submitted and approved by HUD. When developing the 2022-2023 Action Plan, the City refers to its Citizen Participation Plan. For development of the current Action Plan, the Department consulted with local agencies that are engaged in housing, community development, and economic development. There is a 30-day comment period on the Draft Action Plan, which began on March 23, 2022. There will also be two public hearings with the first one being held today, March 24, 2022, and the second one to be held on March 31, 2022, at 5:30 p.m. The public hearings and the 30-day comment period were promoted through a media campaign which included public notices, press releases, website postings, Facebook postings, and emails sent to our community partners and organizations. The public hearings are held in facilities that have access to disabled individuals and, if held virtually, all necessary services are provided upon request. Any citizen wishing to comment on the Draft Action Plan should submit their request in writing beginning Wednesday, March 23, 2022, through Thursday, April 21, 2022, at the following: City of Toledo, Department of Housing and Community Development, 2022-2023 One-Year Action Plan, One Government Center, Suite 1800, Toledo, Ohio 43604.

There were two Citizens Review Committees (CRC) – one for the Non-Homeless Service Providers and the other for the Homeless Service Providers. The CRC members represented various areas of the community, including banking and religious institutions, healthcare providers, public library, financial sector, economic development, and social service agencies. In order for an organization to apply for funding, whether Homeless or Non-Homeless, they had to meet a minimum application requirement. In order to be eligible, the applicant had to be a nonprofit 501(c)(3), in operation for at least two years, and quasi-government, or nonprofit. Also allowed to apply were faith-based, nonprofit 501(c)(3) organizations in operation for at least two years; homeless service providers; for-profit organizations providing direct financial assistance to small businesses; and any organization that demonstrated capacity to implement proposed activities or projects.

Director Clemens provided a summary of the applicants that submitted applications for CDBG, ESG, and HOME funds. There were 27 applications submitted for CDBG, with requests totaling a little over \$3M. For HOME, multi-family rental property development, there were 17 applications, with requests totaling \$25,524,668.00, and for ESG, there were 13 applications, with requests totaling \$2,135,798.00. The resources available to the City as an entitlement community for Program Year 2022-2023 include CDBG, with the anticipated allocation expected to be equivalent to the funding received for Program Year 2021-2022 of \$7,793,514.00. The City also has carryover funds for unspent projects totaling \$1,914,215.00, so the total anticipated resources for CDBG is expected to be a little more than \$9.5M. For HOME, the City is expecting level funding from Program Year 2021-2022, along with carryover funds and HOME-ARP administration dollars, for a total of a little more than \$5M. For ESG, level funding would be \$645,616.00, with no anticipated carryover.

In addition to entitlement funds, there are other resources that an agency either applies for on a competitive basis, or receives as a conduit for other grants and for other organizations in the city. The City has a Lead Hazard Control and Healthy Homes competitive grant of over \$5.3M, a 2017 Lead Hazard Control Grant, and some NSP1 and NSP3 funding that is still remaining and has been programmed for homes planned to be built in the Junction area. The City has also secured a Healthy Homes and Weatherization competitive grant, a BP Husky Settlement Grant, U.S. Treasury Rental Assistance funds, CARES CDBG and ESG funds, an Ohio Department of Health SCHIP Grant, and the City operates as a pass-thru for Historic South Initiative's lead grant. The City is also expecting to launch and program a \$37M Section 108 Loan Pool for mixed-use housing and economic development programs.

Director Clemens provided an overview on the proposed uses of the CDBG funds for Program Year 2022-2023. About 25% of the available CDBG entitlement funds will be spent on housing, which is one of the major priorities in the 2020-2024 Five-Year Consolidated Plan. In addition, 24% of the CDBG funds will

be spent on improving neighborhood conditions for parks, community playgrounds, and community center improvements, which is a major priority of the City's administration. About 16% will be provided to Code Enforcement; 9% on public service activities, including soup kitchens and youth programs; and about 16% will be spent on planning and administration for grants oversight and monitoring. Some of the CDBG funds will also be used to supplement the City's ESG funding to provide support to the homeless service providers. The City's goal is to continue to reduce staff dollars and the drain on CDBG for staffing, and deploy the dollars into projects that are more impactful and align more effectively with the Consolidated Plan goals. Director Clemens noted that a listing of the organizations recommended for CDBG funding and the recommendation amounts were included in the Draft 2022-2023 One-Year Action Plan.

Commissioner McNair spoke about the HOME program and the proposed uses of the HOME program funds. The City anticipates receiving about \$723,000.00 for Community Housing Development Organizations (CHDO's). HUD requires that 15% of the City's allocation is set aside for CHDO's. The City also has a down-payment assistance program, "Home At Last," which will receive about \$302,049.00. This program provides down-payment assistance to low- and moderate-income homebuyers and first-time homebuyers that are at or below 80% of the area median income. The City also supports homebuyer unit production activities and are budgeting \$100,000.00 towards this activity. Funding will also be provided for HOME administration for which the set aside is capped at 10%. In addition to HOME, the City will receive HOME-ARP funds in the amount of \$7.9M. Funds will also be provided for the development pool for homebuyer units and rental housing development. Also to be funded are the Home Rescue Program (homeowner rehab) and rental rehab projects. Commissioner McNair noted that recommendations for the HOME NOFA have been made and will be submitted to Toledo City Council.

Commissioner Bonds provided an overview of the ESG resources for Program Year 2022-2023. The majority of the ESG funding, 33%, will be provided to Beach House for emergency services and rapid re-housing activities. TLCHB will be receiving about 15% for administration and direct financial assistance for citizens needing assistance with utilities and emergency rental payments. United Way of Greater Toledo will be receiving about 18% for hotel/motel stays, as well as for coordinated access. The City is required by HUD to have a coordinated access point for all homeless services and United Way is that point of contact. Family House, which is the largest family shelter in the city, will be receiving about 19%. St. Paul's Community Center will be receiving about 15% for emergency shelter activities. Since ESG is the smallest entitlement funding received from HUD, the City does not anticipate having any carryover, so all of the funding has been earmarked.

After her presentation, Commissioner Bonds asked if there were any questions on the information presented so far. There were no questions from anyone in the audience.

Michael Hart, Executive Director, Toledo Lucas County Homelessness Board (TLCHB), provided an overview of their agency and activities. He was joined by Candace Bishop who is TLCHB's Director of Operations and Compliance. TLCHB is the collaborative applicant and lead for the Homeless Management Information System (HMIS). Their role is to work with many partners throughout the community, such as shelters, housing, and service providers who support persons in the community and work with those that are seeking to end homelessness. TLCHB initiates a lot of planning around the prioritization of different funding programs and models for the homeless system throughout the community, including an inter-agency council, which they are currently working on establishing that will have representation from the leadership of those partners who comprise the homeless response system in Lucas County. This will ensure that those that operate in the system are able to provide information on the priorities, policies, or procedures, and how they plan for the future. They also have a Community Advisory Council that is a collaborative with Lucas Metropolitan Housing (LMH) in which they talk to a

vast array of providers, such as the healthcare system, criminal justice system, or those that operate within the continuum about shared values and priorities.

In partnership with the City, TLCHB will be updating their strategic plan for the local Continuum of Care (CoC), which will provide information about their priorities in terms of funding, program models they want to advance, and how they can support the City, LMH, and other partners in increasing the housing stock through voucher allocations and building new housing. In partnership with the City and through the ESG funding, TLCHB operates the Coordinated Entry System, which is a coordinated process to ensure everyone in the community is appropriately assessed, receive resources, and be directed to the resources most appropriate to their needs. Individuals will have access to the system and resources, such as shelters and emergency rental assistance that provide housing stability or prevent eviction. The Coordinated Entry System focuses on access and assessment ensuring that the needs of those facing housing instability, or are at risk of homelessness, are prioritized according to the highest service needs and the longest length of homelessness. TLCHB works with the City and other partners to ensure there are adequate resources to prevent homelessness.

In addition, TLCHB works with landlords to assist in finding individuals a stable place to live, getting them into housing, and ensuring they are linked to the appropriate supports they need. TLCHB also administers the local CoC program to access additional HUD funding, which totals about \$4.2M this year. This funding complements the ESG funding that the City receives. Mr. Hart ended his presentation by thanking the City and LMH for their partnership and support in ensuring the success of the CoC.

Kattie Bond, Senior Vice President of Operations and Community Development, Lucas Metropolitan Housing (LMH), spoke on behalf of LMH's President and CEO, Joaquin Cintron Vega, about LMH's activities. Ms. Bond was joined by Rachel Gagnon, Chief of Staff, LMH. Ms. Bond began her presentation by thanking Director Clemens, Commissioner Bonds, and Commissioner McNair for the opportunity to talk about LMH and the activities they have planned for Program Year 2022-2023. LMH was established in 1933 and are considered a large public housing authority. They have over 2,633 public housing units; 4,685 housing choice vouchers; 322 low-income housing tax-credit units; and eight market-rate units, which are managed by their nonprofit affiliate, Lucas Housing Services Corporation; as well as 107 homeownership properties that are also under the purview of their nonprofit affiliate. LMH serves approximately 17,500 people in Lucas County, Lower Michigan, and a small portion of Wood County. They have a budget of over \$55M through their public housing, housing choice voucher, mixed-income, and market-rate housing units. In addition, LMH also administers several competitive grants, including the Choice Neighborhoods Grant and Jobs Plus Grant. They also have grants to provide self-sufficiency for their residents, including their Ross and FSS Grants.

Some of the activities that LMH will be conducting during Program Year 2022-2023 include expanding the supply of housing of choice for individuals, families, and special populations; providing improved living environments in a safe way; promoting self-sufficiency, ensuring equal opportunity and affirmatively furthering fair housing; improving the quality of life for their housing residents and encouraging them to become more involved in the management, as well as with participating in homeownership. LMH will also continue to strategically partner with agencies to benefit their residents in the community. To expand the supply of housing of choice for individuals and families, LMH has several developments underway, including Collingwood Green, Phases IV and V; developing the Park Hotel site; working to reposition their portfolio (their plan will be coming out later this year); using various tools including RAD (Rental Assistance Demonstration) conversions allowing them to convert public housing subsidy into project-based rental assistance; and leveraging their housing choice voucher portfolio. They continue to have a rolling RFP where they look for developers and partners to get the vouchers out that can help to expand the community's portfolio for housing of choice. They will also be

developing the McClinton Nunn homes under their Choice Neighborhoods initiative, as well as the greater Junction community.

To provide an improved living environment through public safety, LMH currently utilizes a combination of internal and private security. They are trying to expand their private security and intend to add additional public safety officers to their existing force this year. Their public safety officers conduct community outreach in their developments. They have programs where their public safety officers interact with youth to build rapport and trust with the residents. They will also do physical safety improvements, such as cameras and CO detectors.

To promote self-sufficiency and asset development of LMH-assisted households, LMH will expand its FSS program and program coordinating committee, which is a committee of stakeholders and social support agencies that provide support to LMH residents. They plan to implement a financial opportunity center as an expansion of their FSS program that will be aligned with their Jobs Plus program at their Ravine Park Village and Birmingham Terrace developments. They will be implementing an ESUSU, which is a program that provides rent reporting to credit bureaus, as well as rent relief for residents who may be unable to pay, which allows them to build wealth and become financially stable and to ultimately facilitate them to move from public housing to housing choice voucher and then homeownership. LMH will partner with entities to help expand their WiFi. They plan to add digital devices and connectivity. As far as youth enrichment, LMH will continue to partner with After-School All Stars, which is designed to provide online academic assistance, as well as in-person tutoring for youth. They will continue to ensure affirmatively furthering fair housing and continue to monitor and implement shorter look-back periods to provide additional opportunities for individuals to be housed.

Other activities talked about included improving the quality of life for residents. LMH will work with their central resident advisory board in expanding services to other developments and have resident councils within those developments. They will continue to work with their HUD Jobs Plus Program and integrate their Financial Opportunity Center into that model. They will also continue to provide food for those who need it in partnership with Connecting Kids to Meals and Area Office on Aging. They will also be partnering with Pathway, Inc. to ensure their residents remain housed through their rental assistance and housing stability initiative.

George Thomas, Vice President/General Counsel, Toledo Fair Housing Center (TFHC), spoke about their agency's enforcement and outreach activities, as well as the Analysis of Impediments to Fair Housing Choice (AI). TFHC provides many services in the community including housing enforcement, which directly assists individuals who may have experienced housing discrimination. TFHC investigates the case, gathers information, and assists the individual with filing a complaint, or filing a case in court. TFHC recently completed their annual report, which included data on the impact of their work in the community during the last fiscal year. They reported that approximately 298,096 individuals were fully impacted in some way by their services, which may include trainings for the community or improvements in housing policies and practices. Other activities included education/outreach - 17,950,000 impressions; 73 trainings, 610 investigations, 17,497 educational materials/brochures distributed, and 5,283 individuals trained.

Mr. Thomas provided an overview of the City of Toledo's AI. Because the City of Toledo receives Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds, the City must complete an analysis of the types of issues in the community that may be a barrier to fair housing choice, especially as they impact the class of individuals that are protected legally under the Fair Housing Act. Along with that, the City must develop an action plan to address those barriers to fair housing choice in the community. This process includes gathering a significant amount of information, including demographics, data about locations of mortgages and where they originated, and

census tract information. TFHC conducted focus groups in the community and surveys to gather information about barriers to fair housing choice, as well as talking one-on-one with individuals in the community about the barriers they see to fair housing choice.

Mr. Thomas also talked about the progress made with the AI, along with the progress they hope to see in the near future. One of the things identified in the AI was discrimination based on source of income in our area. If a person has a housing choice voucher or their income is from Social Security Disability, some landlords are unwilling to accept that source of income as counting towards total income for purposes of their rental application. The City of Toledo passed an ordinance that prohibits source of income discrimination. TFHC has been working on training housing providers to better understand that they have this obligation to not discriminate against individuals based on source of income. TFHC has seen some progress in the housing market on this issue, which has helped with their individual enforcement cases. If someone is denied based on source of income, TFHC can argue that it's not a legitimate business practice, which helps to bolster other types of discrimination claims, such as race or disability, so the ordinance has had a positive effect.

In addition, Mr. Thomas talked about the progress made with lead poisoning. The City of Toledo passed an ordinance aimed to prevent lead poisoning by ensuring that rental units are inspected. The City's lead poisoning prevention coalition, which TFHC assists with, meets regularly with the City's lead-safe coordinator in developing the City's capacity to enforce the ordinance. The City has also made progress with the Housing First initiative. As noted in the AI, homelessness is identified as a significant impediment to fair housing choice, along with the barriers to getting persons who are homeless rehoused. TFHC and TLCHB, as well as the local legal aid organization, will be looking at a Memorandum of Understanding to better coordinate their services and be better responsive to homelessness, specifically to the eviction crisis in the area. There are a significant number of eviction filings in the city, which is also identified in the AI as a barrier to fair housing choice.

Mr. Thomas spoke about the progress he hoped will be made in the near future, including the following: 1) the hiring of a tenant services coordinator by the City to build out the framework and make sure the source of income ordinance will be enforced; 2) better engagement/marketing of local loan products, especially in the central city area, including better marketing of existing products and development of better loan products; and 3) increased code enforcement to address housing condition issues.

Commissioner McNair provided an overview of the City's housing programs. The City has many activities that it provides with the HOME funds they receive from HUD. The City has an owner-occupied rehabilitation program, both in-house and with Maumee Valley Habitat for Humanity (MVHFH), called Home Rescue. The City also supports homebuyer development through projects with MVHFH, Preferred Properties, and NeighborWorks Toledo Region, which they support in developing homes that are either rehab or newly constructed for low- and moderate-income buyers. A down-payment assistance program, Home At Last, has provided many new homebuyers with assistance. The City also supports Historic South Initiative, Pathway, Inc., East Toledo Family Center, and Lucas Housing Services Corporation. The City also has rental housing development that it supports and has various organizations that receive that support. TLCHB, Toledo Public Schools, and Lutheran Social Services of Northwestern Ohio are all working together on the Tenant-Based Rental Assistance program. The City provides additional support to TLCHB for their Housing Problem Solving program.

In addition, the City also supports the Toledo/Lucas County Rental Assistance Program, which is funded by the U.S. Department of Treasury. Commissioner McNair emphasized that the City is supporting and offering assistance to low- and moderate-income residents across the board, whether they are in the process of buying a home, want to buy a home that has been newly rehabbed or constructed, need support with rental housing development, or need help with down-payment assistance. With the rental

assistance program, the City has been able to help, along with the Toledo/Lucas County funds it receives, over 2,000 rental units. Between the Toledo Emergency Rental Assistance Program (ERAP) 1 and ERAP 2, coupled with Lucas County ERAP 1 and ERAP 2, approximately \$22M was provided to the families that need it.

Gerard Culkowski, Lead Manager, talked about the City's Lead-Based Paint Hazard Control Grant. During the upcoming Program Year 2022-2023, the City anticipates addressing lead-paint hazards in 109 eligible owner-occupied and residential units. The City has four primary funding sources to assist with this including two from the Office of Lead Hazard Control and Healthy Homes, which are multi-funding years. The City is in its first year of that program, with another 2 ½ -3 years remaining. The City also receives funds from the Lucas County Regional Health District through a BP Husky Grant, which is also a multi-year funding source, in addition to funding from the Ohio Department of Health Medicaid SCHIP, which is annually renewable and will renew on July 1, 2022.

Director Clemens noted that the City of Toledo is spending almost \$4M in ARPA funding to upgrade playgrounds and recreation facilities in the city. Another \$19M of that will be going towards the new Wayman Palmer YMCA. The City is also getting ready to do an RFP for building condition assessments for assessing the conditions of community center buildings, rank them in terms of their usefulness and needs, and really engage in a capital improvement program to upgrade these facilities. This will address the second priority listed in the Consolidated Plan of improving neighborhood conditions. Some of the playgrounds that will be upgraded using CDBG funds include the Navarre Park Inclusive Play Area, Maya and Clinton Park Playground Area, Highland Park Play and Fitness Area, Jamie Farr Enclosed Shelter, Police Athletic Field Complex, as well as the architectural design studies and construction drawings for the new Wayman Palmer facility.

Director Clemens also stated that around \$500,000.00 of CDBG funding will be used to partner with a major CDFI. The goal is to use the City's CDBG funds to leverage CDFI funding to provide a larger pool of small business loans and technical assistance, particularly for the minority and underserved population in the city. The City will also be working with the Economic and Community Development Institute, providing them with funding in the amount of \$50,000.00 for business startups. Another grant program that the City will be launching is the Toledo Inclusion Grant Program. This program is for existing businesses that are operating in underserved areas who need support, expansion, or purchase of equipment/tools to help them get to the next level. The target amount is about \$120,000.00 for this program.

In addition, the City of Toledo will launch the Section 108 Loan Program. The City has already held a public hearing and submitted an application to HUD. Section 108 is a program in which HUD allows communities to leverage their CDBG dollars and borrow up to five times their CDBG dollars to do mixed-use development, housing rehab projects, economic development projects, and job creation projects. The City put together an application that will allow it to access \$37M of Section 108 loan resources at a favorable rate. The City will market this tool in areas of the city that are underserved. The City will soon be releasing its disparity study looking at the contracting and procurement opportunities that haven't been available to minority and underserved populations and looking at why that is the case and how it can be improved. The Section 108 borrowing authority gives the City access to capital and assist with multiple projects, such as opening up a supermarket, doing a hotel, doing mixed-use housing, and helping a small business build or rehab a small shop.

At the end of her presentation, Director Clemens opened it up for questions and/or comments. There was a question for Commissioner Bonds from Linda Parra (Nuestra Gente) regarding the CDBG minimum application requirements for homeless and non-homeless service providers. Ms. Parra asked for a more detailed explanation regarding demonstrated capacity to implement proposed activities or projects.

Commissioner Bonds explained that there are different areas of capacity that an organization needs to have in order to be successful with meeting their outcomes with the HUD dollars. The City requires all agencies to have a 1:1 match because CDBG is a reimbursable grant. The City also has to ask for reimbursement from HUD, so agencies must be able to have unrestricted funds in order to be successful in getting reimbursed for their activities. Agencies need to spend their money first and then request reimbursement. If an agency is recommended for funding, the City monitors them to make sure that the matching funds are coming through.

The City of Toledo, Department of Housing and Community Development will be reaching out to Ms. Parra to schedule a debriefing to review her CDBG application and answer questions.

Commissioner Bonds then asked if there were any further questions from the audience. There were no other questions.

Director Clemens closed the public hearing with thanking her staff and those in attendance. She stated that the City tries to implement a fair and transparent process and award the funds to where they are most needed. The City is available to sit down with anyone to do a detailed debriefing on its decision-making and offer suggestions on how to be more successful in the future.

Director Clemens concluded with thanking everyone for their continued support and partnership with the City of Toledo.

2nd VIRTUAL PUBLIC HEARING SUMMARY

DRAFT 2022-2023 ONE-YEAR ACTION PLAN

March 31, 2022, 5:30 p.m.

A public notice was posted on electronic media and published in local newspapers announcing the virtual public hearing. Due to the COVID-19 Pandemic, the public hearing was held virtually and was accessible to the public through live streaming. Those attending were given the opportunity to ask questions and provide comments.

Bonita Bonds, Commissioner of Administrative Services, City of Toledo, Department of Housing and Community Development (DHCD), began by welcoming everyone to the 2nd Draft 2022-2023 One-Year Action Plan virtual public hearing. Commissioner Bonds informed the audience that Rosalyn Clemens, Director, City of Toledo, DHCD, had a prior obligation and was unable to attend the public hearing. Commissioner Bonds conducted the public hearing in Director Clemens' absence.

Commissioner Bonds explained that the City of Toledo is an entitlement city of Community Development Block Grant (CDBG), HOME Investments Partnership Program (HOME), and Emergency Solutions Grant (ESG) funding, which means the City is entitled to these funds. The City does not have to apply or solicit for them. As long as the City remains compliant, it will receive these funds provided they are budgeted for in Washington.

Commissioner Bonds proceeded in providing an overview of the Consolidated Plan/Action Plan process. The U.S. Department of Housing and Urban Development (HUD) requires the City to provide a five-year plan on how it will administer its dollars for five years. Within those five years, the City is required to submit an annual action plan. The City's Five-Year Consolidated Plan runs from 2020-2024. Through community engagement, data analysis, community surveys, a steering committee, and focus groups that were held in 2020, nine priorities were established for the next five years. Those priorities include 1) improving housing affordability; 2) improving neighborhood conditions; 3) increasing home repairs and housing preservation; 4) economic development (job creation/access and business assistance); 5) adequate housing and services for the homeless population and at-risk individuals; 6) adequate housing and services for other special-needs populations; 7) providing and expanding public services (soup kitchens, homeless providers, community gardens, and activities that address social issues in the community); 8) fair housing; and 9) improving public infrastructure in low- and moderate-income areas. Each year throughout the five-year plan, the City will be addressing these nine priorities.

The Annual Action Plan identifies strategic projects and performance measures that the City will implement using the community's annual allocation from HUD, as well as some residual or carryover dollars. The projects in the Action Plan will support the City's priorities and goals that have been identified in the five-year plan. The City also has an opportunity at times to make changes to that plan if the need arises. The City is able to do this through a Substantial Amendment that must be approved by HUD before it can proceed. The City continues to actively pursue activities and initiatives that will address the HUD national objectives. Two of the HUD Objectives include 1) Benefit to low- and moderate-income individuals or areas in the community, and 2) Elimination of slum and blight in the community. There is also a third National Objective, which is Urgent Need. If the city was in a disaster area due to a hurricane, for example, HUD dollars could be used.

Each of the goals established in the Action Plan must meet a HUD objective or outcome. Three of the objectives are 1) Suitable Living Environment, 2) Decent Housing, and 3) Economic Opportunity. The outcomes must address the following: 1) Improve Availability and Accessibility, 2) Improve Affordability, and 3) Improve Sustainability. The Annual Action Plans gives HUD a roadmap of how the City will be

implementing the dollars each year. At the end of every program year, the City is required to provide an evaluation of how it carried out that plan. This is called the Consolidated Annual Performance and Evaluation Report (CAPER). Every year in September, the City is required to provide HUD with an assessment of how it carried out its Action Plan. The CAPER details how CDBG funds will continue to assist in meeting the needs of low- to moderate-income persons through activities that the City undertakes, such as feeding programs, rehabilitation of homes, health services, and community gardens, as well as improving blighted conditions in neighborhoods. For the current 2021 Program Year, the City will be submitting the CAPER in September 2022. As noted in the 2021 CAPER, the City met most of its priorities and objectives from the 2020-2024 Consolidated Plan. Last year, the City submitted its CAPER to HUD for the 2020 Program Year. The City is pleased to say that it had received its assessment and there were no issues or findings. The City met the benchmarks that were required and received a high marking from HUD.

Commissioner Bonds further explained that the HOME dollars were directed towards down-payment assistance, Tenant-Based Rental Assistance (TBRA), rehabilitation of owner-occupied and rental housing units, along with special projects including multi-family and scattered-site rehabilitation. The DHCD continues to work with its lead Continuum of Care (CoC) agency, the Toledo Lucas County Homelessness Board (TLCHB), in efforts to eliminate homelessness in the community.

Monica Brown, Administrative Analyst IV, City of Toledo, DHCD, talked about the application process and timeline. The public notice was published in the newspapers in November, 2021, announcing the mandatory application packet pickup on January 14, 2022. On January 10, 2022, a press release was sent by the Mayor's office announcing the mandatory application packet pickup. The applicants picked up those packets on January 14, 2022. On February 11, 2022, all applications were due to the DHCD at 4:45 p.m. through its online system, ZoomGrants. The City's Citizens Review Committee (CRC) interviewed the Homeless Service Provider applicants on February 28, 2022, and on March 1, 2, and 3, 2022, the CRC interviewed the Non-Homeless Service Provider applicants. In March, 2022, the City published a public notice announcing the availability of the Draft 2022-2023 One-Year Action Plan and the 30-day comment period and a press release was sent by the Mayor's office on March 8, 2022.

In order to ensure the public is properly notified of HUD programs and information, the City of Toledo is required to follow its Citizen Participation Plan, which is a HUD-approved plan that provides a comprehensive approach for notifying citizens of HUD-approved plans. In development of the City's 2022-2023 One-Year Action Plan, the DHCD consulted with local organizations engaged in housing and community and economic development. There is a 30-day comment period on the Draft Action Plan, which started on March 23, 2022, and will end on April 21, 2022. Written public comments should be sent to: City of Toledo, Department of Housing and Community Development, 2022-2023 One-Year Action Plan, One Government Center, Suite 1800, Toledo, Ohio 43604. The City will hold two public hearings on the Draft 2022-2023 One-Year Action Plan. The first public hearing was conducted on March 24, 2022 at 5:30 p.m. and the second is today, March 31, 2022, 5:30 p.m. The public hearings and the 30-day comment period were promoted through media campaigns which included the public notice, press release, website postings, Facebook postings, and emails to community partners and other organizations. Public hearings are conducted in facilities that provide adequate access to disabled individuals or if held virtually, all necessary services will be provided upon request.

The Citizens Review Committee was comprised of representatives from various community sectors including banking institutions, religious institutions, healthcare providers, public library, financial sector, economic development, and social service agencies. For the review process, there were two committees – one is for the Non-Homeless Service Providers and the other for the Homeless Service Providers. These two committees reviewed the applications, scored, and participated in the applicant interview process. The minimum application requirements for the Homeless and Non-Homeless Service

Provider applicants included having to be a nonprofit 501(c)(3) organization and in operation for at least two years. Also allowed were quasi-government nonprofits, faith-based nonprofit 501(c)(3) organizations in operation for at least two years, homeless service providers, and for-profit organizations providing direct financial assistance to small businesses. Organizations must also have the ability to demonstrate the capacity to implement proposed activities or projects.

Commissioner Bonds provided a summary of the Program Year 2022 applications that the City received. For CDBG, the City received 27 applications from Non-Homeless Service Providers with requests totaling about \$3.1M. For HOME, the City received 17 applications for multi-family rental and property development with requests totaling about \$25.5M. For ESG, the City received 13 applications from Homeless Service Providers with requests totaling \$2.1M. Commissioner Bonds also provided an overview of the resources the City plans on for the 2022 Program Year. These resources are based on the assumption that the City will receive level funding. The City has not yet received official notification from HUD; however, the City must still start their process in order to meet the deadline in submitting its application. For CDBG, the City is estimating that it will receive \$7.5M, which is level funding from the 2021 Program Year. The City also plans to use \$1.9M in carryover funding, for a total of \$9.5M in resources to help in implementing the CDBG program. For HOME, the City is estimating it will receive \$2.1M, and then using \$2.4M in carryover funding. The City also received 5% admin. The City has already received their HOME-ARPA funding in the amount of \$385,000.00, which was given upfront to start planning, so the total HOME allocation to be implemented this year is a little over \$5M. For ESG, the City is estimating it will receive about \$645,000.00.

In addition, Commissioner Bonds provided a breakdown of the City's other resources that are non-entitlement dollars. The City is still spending down its Lead Hazard Control funds in the amount of \$5.3M. The City is completing its 2017 Lead-Based Paint Grant and has about \$100,000.00 to be spent down. This grant will be closed out soon. The City also has a small amount of NSP funds in the amount of \$500,000.00. All original grant dollars have been spent and these are program income dollars that will be spent down. Other resources include a HUD Healthy Homes and Weatherization Grant with about \$980,000.00 remaining, a BP Husky Settlement Grant for \$1,052,000.00, and rental assistance funding from the U.S. Treasury for \$1.7M. The City will also be receiving an additional \$19M for emergency rental assistance and will be spending down its COVID dollars from CDBG and ESG, with about \$1.5M in CDBG COVID and \$130,000.00 in ESG COVID dollars remaining.

Additionally, the City received funding from the Ohio Department of Health for a SCHIP grant in the amount of \$498,000.00 that it plans to spend this year. The City is also the fiscal agent and pass-through agency for Historic South Initiative for a lead grant in the amount of \$500,000.00 from the Ohio Department of Health. The City just received preliminary notification from HUD for approval of its Section 108 Loan Pool application, in the amount of \$37M, and is in the planning stages of putting that loan program together.

For the 2022 Program Year, CDBG resources will be allocated as follows: 3% will be provided to the Homeless Service Providers, 16% for planning and administration, 9% for public service activities, 16% for code enforcement, 7% for economic development, 25% for housing, and 24% for parks and community center improvements. In addition, the CDBG agencies being recommended for funding during the 2022 Program Year are also included in the Draft 2022-2023 One-Year Action Plan. These recommendations will be presented to Toledo City Council for approval.

Tiffanie McNair, Commissioner of Housing, City of Toledo, DHCD, provided a breakdown of the City's HOME allocation. The City estimates receiving a total of \$5,017,938.00 in HOME funding during the 2022 Program Year. Almost 50% of this funding will go into the general development pool. About 14% of funding will go towards Community Housing Development Organization (CHDO) initiatives. HUD

requires that 15% of the City's HOME entitlement be set aside for CHDO's. For HOME administration, the maximum is 10%, but the City has HOME administration funds that are being carried over from previous years. About 2% of HOME funding will go towards homebuyer unit production. The City will also be receiving funds for HOME-ARP administration, which is totally separate from the HOME dollars and are not administered the same, so these funds will be treated separately. About 8% of HOME funding will go towards homeowner rehab, which will be overseen either in-house or by a subrecipient. Seventeen developers responded to the City's NOFA for rental housing development and homebuyer units amounting to approximately \$25M in gap funding. The City made funding recommendations and these will go before Toledo City Council for approval. Recommendations were made for eleven projects, including senior housing, family housing, adaptive re-use, and new construction. The City's recommendation for conditional funding amounts to approximately \$19M.

Commissioner Bonds provided a breakdown of the ESG allocation. This funding allocation is based on the amount the City received in the previous program year totaling \$645,000.00. Beach House will receive about 33%; the Toledo Lucas County Homelessness Board (TLCHB), which is the lead CoC, will receive about 15%; United Way of Greater Toledo will receive about 18%; Family House, which is the City's largest family emergency shelter, will receive about 19%; and St. Paul's Community Center will receive about 15%.

After her presentation, Commissioner Bonds asked if there were any questions on the information presented so far. There were no questions from anyone in the audience.

Michael Hart, Executive Director, Toledo Lucas County Homelessness Board (TLCHB), provided an overview of their agency and activities. TLCHB is the lead agency for the local Continuum of Care (CoC). The CoC seeks to coordinate local efforts to reduce and end homelessness in the community and operates a coordinated entry system, the Homeless Management Information System (HMIS), to ensure there is equitable access to all resources in the community. One of TLCHB's primary responsibilities is to administer and oversee the planning and CoC funding in the community which, for this year, will be about \$2.4M. These resources complement and are integrated within the allocation plan for the ESG funding that the City allocates to Homeless Service Providers. TLCHB works with the City of Toledo to inform the community of the allocation plan for these resources. TLCHB also serves as a third-party partner for the monitoring, both fiscally and performance-wise, of the programs that are funded through these resources. TLCHB, along with its partners, will be conducting a strategic plan to update the community's goals for ending homelessness and the strategies and priorities which, as a Continuum and community, plan to put forth in meeting those goals. TLCHB will continue to work with the City and their partners to advance the impact of their programs.

Rachel Gagnon, Chief of Staff, Lucas Metropolitan Housing (LMH), provided an overview of their agency and plans for the 2022-2023 Program Year. LMH is the local housing authority tasked with managing and operating both their public housing and housing choice voucher portfolios. They also offer housing tax-credit units, market-rate units, homeownership opportunities, and resident/support services. LMH engages with approximately 18,000 individuals and over 7,000 families on a regular basis and partners alongside the City of Toledo and TLCHB. Some of their planned actions for the 2022-2023 Program Year include expanding the supply of housing of choice for individuals, families, and special populations; providing an improved living environment through a strong and growing public safety department; promoting self-sufficiency and asset development for families; ensuring equal opportunity and affirmatively furthering fair housing in the community; improving the quality of life for all residents and participants; encouraging public housing residents to become more involved in management and participate in the pathway to homeownership, and continuing to expand their partnership so they can benefit the community more broadly.

In expanding the supply of housing of choice, LMH has a few projects including Collingwood Green. LMH is getting ready to close on Phase IV and V of this project later this year with the support from the City of Toledo and tax-credit opportunities. LMH will be converting the Park Hotel into apartments for youth aging out of the foster care system. LMH is also looking at additional repositioning within their portfolio to take the resources they have available and those that will become available and reposition them into newer/safer housing opportunities for residents. In addition, they will continue their HCV program and work with landlords willing to engage with them to provide safe and stable housing for participants within that program. LMH also has a Choice Neighborhood Initiative Planning effort, which focuses in the Junction neighborhood with their McClinton Nunn properties, as well as through a collaborative planning process with several different agencies and stakeholders. They are looking to redevelop their McClinton Nunn homes soon.

Additionally, LMH engages with safety officers and private security to ensure all of their properties are safe and secure. Officers provide community policing and engage with residents. LMH recently conducted a security/cameras audit of their entire portfolio. Recommendations will be made on what should be prioritized for new equipment out of their capital fund budget. LMH has also implemented a new ESUSU pilot, which is a program that helps residents who pay rent timely to build credit. They are also looking at piloting a Financial Opportunity Center (FOC) as another way to help support residents in their move toward self-sufficiency. In addition, LMH has an After-School All Stars Program for youth and are engaging with community stakeholders to increase the availability of WIFI in their properties. They have a central resident advisory board who advocates for and represents residents regarding issues and concerns. LMH encourages their residents to become more involved in managing their homeownership opportunities.

Marie Flannery, President and CEO, Toledo Fair Housing Center (TFHC), provided an overview of their agency and activities. TFHC partners with the City of Toledo on affirmatively furthering fair housing activities. The Fair Housing Act requires that anyone that implements HUD programs do so in a way that affirmatively furthers the purposes of the Fair Housing Act. TFHC takes affirmative steps to address residential segregation and housing discrimination from a preventative way rather than only addressing fair housing complaints on a case-by-case basis. As part of this process, the City and all jurisdictions have to, every five years, do a Consolidated Plan that includes an Analysis of Impediments to Fair Housing Choice (AI), which looks at barriers in the community that keep persons from accessing housing of their choice. In 2019/2020, TFHC collaborated with the City on the AI, which identified several things that needed to be worked on over the next few years. As a result, TFHC prepared a Fair Housing Action Plan in partnership with the City and other partners to help them in addressing those identified impediments.

Sarah Jenkins, Director of Public Policy and Community Engagement, TFHC, spoke about the activities performed by their agency. The Fair Housing Action Plan includes the action steps and objectives to be taken as a community to create more equal access to housing opportunities. Ms. Jenkins explained that TFHC is a nonprofit civil rights organization that works to fight housing discrimination and ensure equal access to housing for everyone in the community. This is done through two primary tasks, including 1) Enforcement: TFHC works to make sure that entities in the housing industry are following and complying with fair housing laws by conducting investigations and filing complaints, and 2) Education/Outreach: TFHC conducts trainings, produces educational materials, and engages in many educational activities to raise awareness of fair housing in the community for individuals, tenants, and homebuyers so they know their rights, as well as for the landlords, realtors, and other people that work in the housing industries so they have a better understanding of the laws they have to follow.

Some of the data reported on by Ms. Jenkins from the previous year included the following: On the enforcement side, TFHC conducted more than 600 investigations and were able to impact nearly

300,000 people with their services and programs. When TFHC is investigating a case, they work to not only help that individual who comes to them, but work to implement a policy change that has a broader impact for many people. With their education/outreach work, TFHC was able to achieve nearly 18,000,000 advertising impressions so, every time someone sees an ad, they are learning about fair housing. They also distributed more than 17,000 educational materials, conducted more than 70 trainings, and trained more than 5,000 people.

In addition, Ms. Jenkins provided highlights from the previous year, including the passage of the lead ordinance. The lead ordinance requires rental properties to be inspected to remediate lead hazards so that they are lead-safe and prevent children from being lead poisoned. The City hired a lead-safe coordinator who worked on education and outreach to ensure the community was familiar with the ordinance and aware of lead hazards. The lead-safe coordinator also worked on workforce development to ensure there were inspectors and contractors trained and certified to do the lead remediation. Over the next year, TFHC will continue to focus on the issue of housing conditions. When TFHC conducted the AI, they sought feedback from the community. The number one issue brought to their attention was housing conditions, partly due to the City's older housing stock which is not always well maintained. Ms. Jenkins stated that moving forward the focus should be on how to improve the housing conditions in the community. This can be done by strengthening code enforcement, as well as making sure funds are available for rehab and repair so housing can be safe and stable.

Commissioner McNair talked about some of the key housing projects and initiatives the City of Toledo will undertake for the upcoming program year. The City will continue to do homebuyer development with the Lucas Housing Services Corporation. Eleven projects have been recommended for conditional funding and will be presented to Toledo City Council for approval. Approximately 1,000 rental units will be developed in the city over the next few years. The City will continue to partner with TLCHB, Toledo Public Schools, and Lutheran Social Services on a Tenant-Based Rental Assistance program, as well as with TLCHB's Housing Problem-Solving Program. The City also has partnerships with NeighborWorks Toledo Region, Preferred Properties, Maumee Valley Habitat for Humanity, and East Toledo Family Center. In addition, the City administers several programs in-house, including the Home At Last Down Payment Assistance Program. The City has exceeded 100 new low- and moderate-income homebuyers who have received assistance through this program. The City will receive an additional \$19.4M from the U.S. Treasury for its rental assistance program.

Gerald Culkowski, Lead Manager, City of Toledo, DHCD, spoke about the Lead Program. The City of Toledo receives non-entitlement funds in order to address targeted housing concerns. During the upcoming Action Plan year, the City proposes to address lead-paint hazards identified in 109 eligible owner-occupied and rental residential units. This will be accomplished through the utilization of four primary funding sources, three of which are multi-year funding. Two of those are from the Office of Lead Hazard Control and Healthy Homes and one is from the Lucas County Health Department. The fourth source is an annual renewable source through the Ohio Department of Health Medicaid SCHIP Program.

Commissioner Bonds highlighted some of the other initiatives the City of Toledo is undertaking, including playground and infrastructure improvements. These projects include upgrading the playgrounds at Navarre Park, Maya and Clinton Park; the play/fitness area at Highland Park; the enclosed shelter at Jamie Farr Park, including electrical upgrades, ceiling, lighting, and sidewalk improvements; and upgrades at the Police Athletic League Multi-Purpose Field. The City will also be partnering with Local Initiatives Support Corporation (LISC) on some equity, inclusion, small business loans, and technical assistance to some of the small business partners in Toledo. The plan is to provide \$500,000.00 to LISC and \$50,000.00 to the Economic and Community Development Institute. In

addition, the City's Section 108 Loan Pool Program application has been approved by HUD. The City has begun the planning phase and how it will be implemented.

Commissioner Bonds then asked if there were any questions or comments. There were no questions or comments from those in attendance.

Commissioner Bonds concluded with stating that the City's funding recommendations would be presented to Toledo City Council for approval. After approval, the City will submit the Action Plan to HUD once official notification of the funding allocations are received. The 2022-2023 One-Year Action Plan is due to HUD on May 18, 2022.

Commissioner Bonds reiterated that the public hearing was a requirement and is being recorded. The recording will be submitted to HUD, along with the Action Plan, and include any comments the City receives.

Commissioner Bonds thanked everyone for attending and all those that presented at the public hearing.

City of Toledo
Department of Housing and Community Development
One Year Action Plan (2022-2023)
One Government Center, Suite 1800
Toledo, OH.43604

Dear Director,

I have reviewed the city's One Year Action Plan and am glad to see a major focus on housing people, particularly the homeless and indigent, home repairs and housing affordability. Some resources are tied directly to lead paint abatement and rental assistance.

Many objectives listed to; demolish blighted properties, decrease rodents, remediate contaminated sites, assist in home ownership and development of affordable housing are typical perennial desires, but without job creation, aka economic development, to enable people to pay their bills, will be persistent problems.

In tabulating the estimated funds available at \$40,223,105.00, it is difficult to account for dispersals. I also had difficulty understanding why the Continuum of Care (\$4,476,415.00), Lucas County Land Reutilization Corp. (\$4,450,000.00) and American Rescue Plan (\$950,000.00) funds were not included in estimated available funds. Then there are the carryover funds (\$2,000,000.00) from previous years.

The actual number of households (248) to benefit from repairs, youths (92) to be enriched, women (116) to receive minor prenatal care, elderly (80) to benefit from minor home repairs, homeless (750) to receive housing assistance, and businesses (14) to receive incentives is low. Some of the assumptions made on health assistance (4,750) and food supplementation (9,154) is just unrealistic and needs to be reassessed. Sadly, again, almost four million (\$3,938,875.00) goes to city administration departments to administer the funds with (\$1,378,912.00) being provided to code enforcement and nuisance abatement to plague (40,000) residents with citations for repairs that they probably can't afford to make. Needless to say, (\$51,000.00 and \$59,660.00) are then allocated to beef up inspections and legal enforcement. CDBG dollars should directly benefit LMI individuals, not make their lives miserable, because their lives are already miserable. Lucas Metropolitan Housing is a bottomless pit, still institutionalizing people in miserable settings. I hope the organization can see the benefits of affordable modern small housing units and neighborhood integration to stop the cycle of demoralization and dependency. Again, economic development investment is needed.

As a final statement, only (5) parks will receive funding for improvement with community gardening receiving a pittance. We need more green space in these neighborhoods that have been disinvested in for decades. Community gardens build community and helps to feed people. It is unfortunate that the city is still referring to the 2020 Comprehensive Plan, outdated zoning and code regulations. We need to catch up with other large post-industrial cities and embrace emerging economic opportunities beyond fast food outlets and dollar stores.

Sincerely,



Gina K. Moesser

PUBLIC NOTICE

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CDBG applications will be accepted with a funding priority for the following programs/activities:

Programs/Activities

Housing Preservation
Public Facilities and Infrastructure
Public Services (15%)

Available Funding

Approximately \$1,000,000
Approximately \$1,000,000
Approximately \$1,100,000

Eligible applicants: 501 (c) 3 organizations, other nonprofits and government agencies.

HOME applications will be accepted from certified City of Toledo Community Housing and Development Organizations (CHDO) for the following projects that demonstrate a gap in financing, address the City of Toledo's affordable and special populations homeownership needs, and leverage HOME funds with other funding sources.

Projects

Construction/Rehabilitation of Homebuyer Units (non-CHDO)
Construction/Rehabilitation of Homebuyer Units (CHDO)

Available Funding

Approximately \$500,000
Approximately \$330,000

**TO APPLY FOR FUNDING, APPLICANTS MUST PICK UP THEIR APPLICATION MATERIAL
ON THE FOLLOWING:**

Community Development Block Grant (CDBG)

(for Non-Homeless Service Providers)

Friday, January 14, 2022

9:00 a.m. - 11:00 a.m.

One Government Center (1st Floor Lobby)

640 Jackson Street

Toledo, OH 43604

Emergency Solutions Grant (ESG)

(for Homeless Service Providers)

Friday, January 14, 2022

1:30 p.m. - 3:30 p.m.

One Government Center (1st Floor Lobby)

640 Jackson Street

Toledo, OH 43604

CDBG Application Zoom Training

Thursday, January 27, 2022 at 10:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/84754762282>

ESG Application Zoom Training

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Zoom Link: <https://toledo-oh-gov.zoom.us/j/88509297752>

HOME NOFA Workshop (via Zoom)

Wednesday, January 26, 2022, at 10:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/83035084101>

**THE DEADLINE FOR SUBMITTING CDBG AND ESG APPLICATIONS IS
FRIDAY, FEBRUARY 11, 2022 AT 4:45 P.M.**

**THE DEADLINE FOR SUBMITTING THE HOME APPLICATION IS
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COMPLETED APPLICATIONS MUST BE SUBMITTED THROUGH ZOOMGRANTS

FOR CDBG/ESG: For additional information, please contact Monica Brown, Administrative Analyst IV, at monica.brown@toledo.oh.gov.

FOR HOME: For additional information, please contact Tiffanie McNair, Housing Commissioner, at tiffanie.mcnair@toledo.oh.gov.

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Housing Preservation	Approximately \$1,000,000
Public Facilities and Infrastructure	Approximately \$1,000,000
Public Services (15%)	Approximately \$1,100,000

Eligible applicants: 501 (c) 3 organizations, other nonprofits and government agencies.

HOME applications will be accepted from certified City of Toledo Community Housing and Development Organizations (CHDO) for the following projects that demonstrate a gap in financing, address the City of Toledo's affordable and special populations homeownership needs, and leverage HOME funds with other funding sources.

<u>Projects</u>	<u>Available Funding</u>
Construction/Rehabilitation of Homebuyer Units (non-CHDO)	Approximately \$500,000
Construction/Rehabilitation of Homebuyer Units (CHDO)	Approximately \$330,000

TO APPLY FOR FUNDING, APPLICANTS MUST PICK UP THEIR APPLICATION MATERIAL ON THE FOLLOWING:

Community Development Block Grant (CDBG)

(for Non-Homeless Service Providers)

Friday, January 14, 2022

9:00 a.m. - 11:00 a.m.

One Government Center (1st Floor Lobby)

640 Jackson Street

Toledo, OH 43604

Emergency Solutions Grant (ESG)

(for Homeless Service Providers)

Friday, January 14, 2022

1:30 p.m. - 3:30 p.m.

One Government Center (1st Floor Lobby)

640 Jackson Street

Toledo, OH 43604

CDBG Application Zoom Training

Thursday, January 27, 2022 at 10:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/84754762282>

ESG Application Zoom Training

Friday, January 28, 2022 at 10:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/88509297752>

HOME NOFA Workshop (via Zoom)

Wednesday, January 26, 2022, at 10:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/83035084101>

**THE DEADLINE FOR SUBMITTING CDBG AND ESG APPLICATIONS IS
FRIDAY, FEBRUARY 11, 2022 AT 4:45 P.M.**

**THE DEADLINE FOR SUBMITTING THE HOME APPLICATION IS
FRIDAY, FEBRUARY 11, 2022 AT 4:45 P.M.**

COMPLETED APPLICATIONS MUST BE SUBMITTED THROUGH ZOOMGRANTS

FOR CDBG/ESG: For additional information, please contact Monica Brown, Administrative Analyst IV, at monica.brown@toledo.oh.gov.

FOR HOME: For additional information, please contact Tiffanie McNair, Housing Commissioner, at tiffanie.mcnair@toledo.oh.gov.

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Brown, Monica

From: Thorpe, Susan
Sent: Monday, November 29, 2021 10:22 AM
To: EAST TOLEDO FAMILY CENTER; HELPING HANDS OF; LEGAL AID OF WESTERN OHIO, INC.; 'mhoffman@nhainc.org'; MLK KITCHEN FOR THE POOR, INC; 'mmcintyre@mvhabitat.org'; 'mwolff_etsac@yahoo.com'; NEIGHBORHOOD HEALTH ASSOCIATION, IN; 'scrabtree@ablelaw.org'; TOLEDO SEAGATE; NEIGHBORWORKS TOLEDO REGION; NEIGHBORWORKS TOLEDO REGION; 'Yvonne Dubielak'; Zgodzinski, Eric; 'vmartinez@lawolaw.org'; 'rschuster@toledodiocese.org'; 'believecenter@yahoo.com'; 'jhabib@spcc-toledo.org'; 'dargatza@co.lucas.oh.us'; 'jb_sqacc@yahoo.com'; 'Jeff Swiech'; 'believecenter@gmail.com'; 'emcpartland@mvhabitat.org'; 'GrantWriter'; 'mindy@seagatefoodbank.org'; 'Kachinger@mvhabitat.org'; 'DeniseF@auroraprojectinc.org'; 'rjordan@pathwaytoledo.org'; 'eod.sqacc@gmail.com'; 'matt.morris@unitedwaytoledo.org'; 'jodig@etfc.org'; 'cfellman@ablelaw.org'; 'dstefansky@toledodiocese.org'; 'antduan8213@gmail.com'; 'LindaSkowronek@toledofhc.org'; 'carol.gray@toledogrows.org'; 'wendy.pesttrue@unitedwaytoledo.org'; 'cmiller@pathwaytoledo.org'; 'gcommu8708@bex.net'; 'pageelaine1@aol.com'; 'tamholliker@aol.com'; 'Marc D. Folk'; 'jjarrett@theartscommission.org'; 'mculling@theartscommission.org'; 'rbunch@theartscommission.org'; 'cwillson@preferred-properties.org'; 'sfriedman@toledofhc.org'; 'dpeluso@familyhousetoledo.org'; 'stacic@etfc.org'; 'jfrost@nhainc.org'; 'mcassidy@preferred-properties.org'; 'msachs@nwtoledo.org'; 'lweller@lawolaw.org'; 'sshrewsbury@toledodiocese.org'; Welch, David; 'mariemflannery@toledofhc.org'; 'lpengov@spcc-toledo.org'; 'Tonia Pace'; 'dalexander@familyhousetoledo.org'; 'mjacommet@nwtoledo.org'; 'jacksonv@co.lucas.oh.us'; 'anneruch@gmail.com'; 'zach.steinmetz@ampf.com'; 'jmpinskey@gmail.com'; 'nancy.elzinga@gmail.com'; 'kbond@lucasmha.org'; 'Scott Herr'; 'jcintronvega@lucasmha.org'; 'grantsadministrator@tlchb.org'; 'elaina@believecenter.org'; 'janeltate@gmail.com'; 'jblack@pathwaytoledo.org'; 'sifuentesh@co.lucas.oh.us'; 'eellis@toledodesigncollective.org'; 'Martin Jarret'; 'paul@toledodesigncollective.org'; 'dmann@co.lucas.oh.us'; Brownlee, Shantae; 'sshackelford@co.lucas.oh.us'; Stone, Robin; 'gthomas@toledofhc.org'; Kristie Clark; Patricia Allison; 'byoung@preferred-properties.org'; 'dvasquez@preferred-properties.org'; Michael Jewell; 'mhart@tlchb.org'; 'hzeller@lucasmha.org'
Cc: Bonds, Bonita; Brown, Monica; Harris, Morlon; Phillips, Regina; Williams, Darlene
Subject: PY-2022 CDBG/ESG/HOME Application Public Notice
Attachments: PY 2022 CDBG-ESG-HOME App PubNot.docx
Importance: High

Good morning,

The City of Toledo announces the availability of federal funding for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) for the 2022 Program Year (July 1, 2022 - June 30, 2023).

Please see the attached public notice for information on applying for funds.

Susan Thorpe
Clerk Specialist II
City of Toledo
Department of Neighborhoods
One Government Center, Suite 1800
Toledo, OH 43604
(419) 245-1441 (office)
(419) 245-1192 (fax)
susan.thorpe@toledo.oh.gov

Visit us at: **www.toledo.oh.gov**

PUBLIC NOTICE

The City of Toledo announces the availability of federal funding for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) for the 2022 Program Year (July 1, 2022 - June 30, 2023).

CDBG applications will be accepted with a funding priority for the following programs/activities:

Programs/Activities

Housing Preservation
Public Facilities and Infrastructure
Public Services (15%)

Available Funding

Approximately \$1,000,000
Approximately \$1,000,000
Approximately \$1,100,000

Eligible applicants: 501 (c) 3 organizations, other nonprofits and government agencies.

HOME applications will be accepted from certified City of Toledo Community Housing and Development Organizations (CHDO) for the following projects that demonstrate a gap in financing, address the City of Toledo's affordable and special populations homeownership needs, and leverage HOME funds with other funding sources.

Projects

Construction/Rehabilitation of Homebuyer Units (non-CHDO)
Construction/Rehabilitation of Homebuyer Units (CHDO)

Available Funding

Approximately \$500,000
Approximately \$330,000

**TO APPLY FOR FUNDING, APPLICANTS MUST PICK UP THEIR APPLICATION MATERIAL
ON THE FOLLOWING:**

Community Development Block Grant (CDBG)

(for Non-Homeless Service Providers)

Friday, January 14, 2022

9:00 a.m. - 11:00 a.m.

One Government Center (1st Floor Lobby)

640 Jackson Street
Toledo, OH 43604

Emergency Solutions Grant (ESG)

(for Homeless Service Providers)

Friday, January 14, 2022

1:30 p.m. - 3:30 p.m.

One Government Center (1st Floor Lobby)

640 Jackson Street
Toledo, OH 43604

CDBG Application Zoom Training

Thursday, January 27, 2022 at 10:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/84754762282>

ESG Application Zoom Training

Friday, January 28, 2022 at 10:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/88509297752>

HOME NOFA Workshop (via Zoom)

Wednesday, January 26, 2022, at 10:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/83035084101>

**THE DEADLINE FOR SUBMITTING CDBG AND ESG APPLICATIONS IS
FRIDAY, FEBRUARY 11, 2022 AT 4:45 P.M.**

**THE DEADLINE FOR SUBMITTING THE HOME APPLICATION IS
FRIDAY, FEBRUARY 11, 2022 AT 4:45 P.M.**

COMPLETED APPLICATIONS MUST BE SUBMITTED THROUGH ZOOMGRANTS

FOR CDBG/ESG: For additional information, please contact Monica Brown, Administrative Analyst IV, at monica.brown@toledo.oh.gov.

FOR HOME: For additional information, please contact Tiffanie McNair, Housing Commissioner, at tiffanie.mcnair@toledo.oh.gov.

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[HOME](#) > [NEWS](#) > [NOTICE OF FUNDING AVAILABLE](#)

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Applicants
Needed](#)

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Water
Commission
Meeting](#)

[Emergency
Mortgage
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Notice of Funding Available

 Monday, November 29, 2021

The City of Toledo announces the availability of federal funding for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) for the 2022 Program Year (July 1, 2022 - June 30, 2023).

CDBG

CDBG applications will be accepted with a funding priority for the following programs/activities:

Programs/Activities	Available Funding
Housing Preservation	Approximately \$1,000,000
Public Facilities and Infrastructure	Approximately \$1,000,000

Program
Application
Period
Extended

Sewer
Flushing
Update


Programs/Activities

Public Services (15%)

Available Funding

Approximately
\$1,100,000

Eligible applicants: 501 (c) 3 organizations, other nonprofits and government agencies.

[Back to](#) 

[All News](#)

HOME

HOME applications will be accepted from certified City of Toledo Community Housing and Development Organizations (CHDO) for the following projects that demonstrate a gap in financing, address the City of Toledo's affordable and special populations homeownership needs, and leverage HOME funds with other funding sources.

Projects	Available Funding
Construction/Rehabilitation of Homebuyer Units (non-CHDO)	Approximately \$500,000
Construction/Rehabilitation of Homebuyer Units (CHDO)	Approximately \$330,000

Applications

To apply for funding, applicants must pick up their application material on the following days:

Community Development Block Grant (CDBG) (for Non-Homeless Service Providers)

Friday, January 14, 2022

9 - 11 a.m.

One Government Center (1st Floor Lobby)

640 Jackson Street

Toledo, OH 43604

Emergency Solutions Grant (ESG) (for Homeless Service Providers)


Friday, January 14, 2022

1:30 - 3:30 p.m.

One Government Center (1st Floor Lobby)
640 Jackson Street
Toledo, OH 43604

Workshops and Training


 **January 27, 2022**

 10 a.m.

 CDBG Application Zoom Training

 [Join Now](#)


 **January 28, 2022**

 10 a.m.

 ESG Application Zoom Training

 [Join Now](#)

 **January 26, 2022**

 10 a.m.

 HOME NOFA Zoom Workshop

 [Join Now](#)

Deadlines

The deadline for submitting **CDBG and ESG** applications is: **Friday, February 11, 2022 at 4:45 p.m.**

For additional information, please contact Monica Brown, Administrative Analyst IV, at monica.brown@toledo.oh.gov.

The deadline for submitting the **HOME** application is: **Friday, February 11, 2022 at 4:45 p.m.**

For additional information, please contact Tiffanie McNair, Housing Commissioner, at tiffanie.mcnaair@toledo.oh.gov.

Completed applications must be submitted through ZoomGrants.

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- | | | |
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One Government Center
640 Jackson Street, Toledo, OH 43604



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Request a service

Brown, Monica

From: Thorpe, Susan
Sent: Friday, January 7, 2022 9:53 AM
To: EAST TOLEDO FAMILY CENTER; HELPING HANDS OF; LEGAL AID OF WESTERN OHIO, INC.; 'mhoffman@nhainc.org'; MLK KITCHEN FOR THE POOR, INC; 'mmcintyre@mvhabitat.org'; 'mwolff_etsac@yahoo.com'; NEIGHBORHOOD HEALTH ASSOCIATION, IN; 'scrabtree@ablelaw.org'; TOLEDO SEAGATE; NEIGHBORWORKS TOLEDO REGION; NEIGHBORWORKS TOLEDO REGION; 'Yvonne Dubielak'; Zgodzinski, Eric; 'vmartinez@lawolaw.org'; 'rschuster@toledodiocese.org'; 'believecenter@yahoo.com'; 'jhabib@spcc-toledo.org'; 'dargatza@co.lucas.oh.us'; 'jb_sqacc@yahoo.com'; 'Jeff Swiech'; 'believecenter@gmail.com'; 'emcpartland@mvhabitat.org'; 'GrantWriter'; 'mindy@seagatefoodbank.org'; 'Kachinger@mvhabitat.org'; 'DeniseF@auroraprojectinc.org'; 'rjordan@pathwaytoledo.org'; 'eod.sqacc@gmail.com'; 'matt.morris@unitedwaytoledo.org'; 'jodig@etfc.org'; 'cfellman@ablelaw.org'; 'dstefansky@toledodiocese.org'; 'antduan8213@gmail.com'; 'LindaSkowronek@toledofhc.org'; 'carol.gray@toledogrows.org'; 'wendy.pesttrue@unitedwaytoledo.org'; 'cmiller@pathwaytoledo.org'; 'gcommu8708@bex.net'; 'pageelaine1@aol.com'; 'tamholliker@aol.com'; 'Marc D. Folk'; 'jjarrett@theartscommission.org'; 'mculling@theartscommission.org'; 'rbunch@theartscommission.org'; 'cwilson@preferred-properties.org'; 'sfriedman@toledofhc.org'; 'dpeluso@familyhousetoledo.org'; 'jfrost@nhainc.org'; 'mcassidy@preferred-properties.org'; 'msachs@nwtoledo.org'; 'lweller@lawolaw.org'; 'sshrewsbury@toledodiocese.org'; Welch, David; 'mariemflannery@toledofhc.org'; 'lpengov@spcc-toledo.org'; 'Tonia Pace'; 'dalexander@familyhousetoledo.org'; 'mjacommet@nwtoledo.org'; 'jacksonv@co.lucas.oh.us'; 'anneruch@gmail.com'; 'zach.steinmetz@ampf.com'; 'jmpinskey@gmail.com'; 'nancy.elzinga@gmail.com'; 'kbond@lucasmha.org'; 'Vonzelle Hill'; 'Scott Herr'; 'rgagnon@tlchb.org'; 'jcintronvega@lucasmha.org'; 'grantsadministrator@tlchb.org'; 'elaina@believecenter.org'; 'janeltate@gmail.com'; 'jblack@pathwaytoledo.org'; 'eellis@toledodesigncollective.org'; 'Martin Jarret'; 'paul@toledodesigncollective.org'; 'dmann@co.lucas.oh.us'; Brownlee, Shantae; 'sshackelford@co.lucas.oh.us'; Stone, Robin; 'gthomas@toledofhc.org'; Kristie Clark; Patricia Allison; 'byoung@preferred-properties.org'; 'dvasquez@preferred-properties.org'; Michael Jewell; 'mhart@tlchb.org'; 'hzeller@lucasmha.org'; 'rgagnon@lucasmha.org'; 'stokest@co.lucas.oh.us'; 'frankt@co.lucas.oh.us'; Candace Bishop
Cc: Bonds, Bonita; Brown, Monica; Harris, Morlon; Phillips, Regina; Williams, Darlene
Subject: PY-2022 CDBG/ESG/HOME Application Public Notice (REMINDER)
Attachments: PY 2022 CDBG-ESG-HOME App PubNot.docx
Importance: High

Good morning,

Just a reminder -

The City of Toledo announces the availability of federal funding for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) for the 2022 Program Year (July 1, 2022 - June 30, 2023).

To apply for funding, applicants must pick up their application material on the following:

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)

(for Non-Homeless Service Providers)

Friday, January 14, 2022

9:00 a.m. - 11:00 a.m.

One Government Center (1st Floor Lobby)

640 Jackson Street

Toledo, OH 43604

EMERGENCY SOLUTIONS GRANT (ESG)

(for Homeless Service Providers)

Friday, January 14, 2022

1:30 p.m. - 3:30 p.m.

One Government Center (1st Floor Lobby)

640 Jackson Street

Toledo, OH 43604

CDBG Application Zoom Training

Thursday, January 27, 2022 at 10:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/84754762282>

ESG Application Zoom Training

Friday, January 28, 2022 at 10:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/88509297752>

HOME NOFA Workshop (via Zoom)

Wednesday, January 26, 2022, at 10:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/83035084101>

The deadline for submitting CDBG and ESG applications is: **FRIDAY, FEBRUARY 11, 2022 AT 4:45 P.M.**

The deadline for submitting the HOME application is: **FRIDAY, FEBRUARY 11, 2022 AT 4:45 P.M.**

Completed applications must be submitted through ZoomGrants.

Please see the attached public notice for additional information.

Susan Thorpe
Clerk Specialist II
City of Toledo
Department of Neighborhoods
One Government Center, Suite 1800
Toledo, OH 43604
(419) 245-1441 (office)
(419) 245-1192 (fax)
susan.thorpe@toledo.oh.gov

Visit us at: www.toledo.oh.gov

PUBLIC NOTICE

The City of Toledo announces the availability of federal funding for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Program (HOME) for the 2022 Program Year (July 1, 2022 - June 30, 2023).

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Programs/Activities

Housing Preservation
Public Facilities and Infrastructure
Public Services (15%)

Available Funding

Approximately \$1,000,000
Approximately \$1,000,000
Approximately \$1,100,000

Eligible applicants: 501 (c) 3 organizations, other nonprofits and government agencies.

HOME applications will be accepted from certified City of Toledo Community Housing and Development Organizations (CHDO) for the following projects that demonstrate a gap in financing, address the City of Toledo's affordable and special populations homeownership needs, and leverage HOME funds with other funding sources.

Projects

Construction/Rehabilitation of Homebuyer Units (non-CHDO)
Construction/Rehabilitation of Homebuyer Units (CHDO)

Available Funding

Approximately \$500,000
Approximately \$330,000

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ON THE FOLLOWING:**

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(for Non-Homeless Service Providers)

Friday, January 14, 2022

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640 Jackson Street

Toledo, OH 43604

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(for Homeless Service Providers)

Friday, January 14, 2022

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640 Jackson Street

Toledo, OH 43604

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FRIDAY, FEBRUARY 11, 2022 AT 4:45 P.M.**

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FOR CDBG/ESG: For additional information, please contact Monica Brown, Administrative Analyst IV, at monica.brown@toledo.oh.gov.

FOR HOME: For additional information, please contact Tiffanie McNair, Housing Commissioner, at tiffanie.mcnair@toledo.oh.gov.

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Brown, Monica

From: Thorpe, Susan
Sent: Monday, January 10, 2022 8:50 AM
To: EAST TOLEDO FAMILY CENTER; HELPING HANDS OF; LEGAL AID OF WESTERN OHIO, INC.; 'mhoffman@nhainc.org'; MLK KITCHEN FOR THE POOR, INC; 'mmcintyre@mvhabitat.org'; 'mwolff_etsac@yahoo.com'; NEIGHBORHOOD HEALTH ASSOCIATION, IN; 'scrabtree@ablelaw.org'; TOLEDO SEAGATE; NEIGHBORWORKS TOLEDO REGION; NEIGHBORWORKS TOLEDO REGION; 'Yvonne Dubielak'; Zgodzinski, Eric; 'vmartinez@lawolaw.org'; 'rschuster@toledodiocese.org'; 'believecenter@yahoo.com'; 'jhabib@spcc-toledo.org'; 'dargatza@co.lucas.oh.us'; 'jb_sqacc@yahoo.com'; 'Jeff Swiech'; 'believecenter@gmail.com'; 'emcpartland@mvhabitat.org'; 'GrantWriter'; 'mindy@seagatefoodbank.org'; 'Kachinger@mvhabitat.org'; 'DeniseF@auroraprojectinc.org'; 'rjordan@pathwaytoledo.org'; 'eod.sqacc@gmail.com'; 'matt.morris@unitedwaytoledo.org'; 'jodig@etfc.org'; 'cfellman@ablelaw.org'; 'dstefansky@toledodiocese.org'; 'antduan8213@gmail.com'; 'LindaSkowronek@toledofhc.org'; 'carol.gray@toledogrows.org'; 'wendy.pesttrue@unitedwaytoledo.org'; 'cmiller@pathwaytoledo.org'; 'gcommu8708@bex.net'; 'pageelaine1@aol.com'; 'tamholliker@aol.com'; 'Marc D. Folk'; 'jjarrett@theartscommission.org'; 'mculling@theartscommission.org'; 'rbunch@theartscommission.org'; 'cwilson@preferred-properties.org'; 'sfriedman@toledofhc.org'; 'dpeluso@familyhousetoledo.org'; 'jfrost@nhainc.org'; 'mcassidy@preferred-properties.org'; 'msachs@nwtoledo.org'; 'lweller@lawolaw.org'; 'sshrewsbury@toledodiocese.org'; Welch, David; 'mariemflannery@toledofhc.org'; 'lpengov@spcc-toledo.org'; 'Tonia Pace'; 'dalexander@familyhousetoledo.org'; 'mjacomet@nwtoledo.org'; 'jacksonv@co.lucas.oh.us'; 'anneruch@gmail.com'; 'zach.steinmetz@ampf.com'; 'jmpinskey@gmail.com'; 'nancy.elzinga@gmail.com'; 'kbond@lucasmha.org'; 'Vonzelle Hill'; 'Scott Herr'; 'rgagnon@tlchb.org'; 'jcintronvega@lucasmha.org'; 'grantsadministrator@tlchb.org'; 'elaina@believecenter.org'; 'janeltate@gmail.com'; 'jblack@pathwaytoledo.org'; 'eellis@toledodesigncollective.org'; 'Martin Jarret'; 'paul@toledodesigncollective.org'; 'dmann@co.lucas.oh.us'; Brownlee, Shantae; 'sshackelford@co.lucas.oh.us'; Stone, Robin; 'gthomas@toledofhc.org'; Kristie Clark; Patricia Allison; 'byoung@preferred-properties.org'; 'dvasquez@preferred-properties.org'; Michael Jewell; 'mhart@tlchb.org'; 'hzeller@lucasmha.org'; 'rgagnon@lucasmha.org'; 'stokest@co.lucas.oh.us'; 'frankt@co.lucas.oh.us'; Candace Bishop
Cc: Bonds, Bonita; Brown, Monica; Harris, Morlon; Phillips, Regina; Williams, Darlene
Subject: FW: Media Release: City of Toledo Dept. of Neighborhoods Release 2022-2023 Community Development Block Grant, Emergency Solutions Grant & HOME Investment Application Availability
Attachments: CBDG Grant Release.pdf

Good morning,

Please see the media release below.

Susan Thorpe
Clerk Specialist II
City of Toledo
Department of Neighborhoods

One Government Center, Suite 1800
Toledo, OH 43604
(419) 245-1441 (office)
(419) 245-1192 (fax)
susan.thorpe@toledo.oh.gov

Visit us at: www.toledo.oh.gov

From: Voigt, Amy
Sent: Monday, January 10, 2022 8:24 AM
To: Voigt, Amy <Amy.Voigt@toledo.oh.gov>
Subject: Media Release: City of Toledo Dept. of Neighborhoods Release 2022-2023 Community Development Block Grant, Emergency Solutions Grant & HOME Investment Application Availability

JANUARY 10, 2022

City of Toledo Department of Neighborhoods Release 2022-2023 Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG) and HOME Investment Partnerships Program Application Availability

The City of Toledo announces the availability of federal funds for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnership Program (HOME) for the 2022 Program Year (July 1, 2022 - June 30, 2023).

CDBG applications will be accepted with a priority for the following programs/activities:

Programs/Activities Available Funding

Housing Preservation Approximately \$1,000,000

Public Facilities and Infrastructure Approximately \$1,000,000

Public Services (15%) Approximately \$1,100,000

Eligible applicants: 501 (c) 3 organizations, other nonprofits and government agencies.

HOME applications will be accepted from certified City of Toledo Community Housing and Development Organizations (CHDO) for the following projects that demonstrate a gap in financing, address the City of Toledo's affordable and special populations homeownership needs, and leverage HOME funds with other funding sources.

Projects Maximum Award

Construction/Rehabilitation of Homebuyer Units (non-CHDO) Approximately \$500,000

Construction/Rehabilitation of Homebuyer Units (CHDO) Approximately \$330,000

TO APPLY FOR FUNDING, APPLICANTS MUST PICK UP THEIR APPLICATION MATERIAL ON THE FOLLOWING:

Community Development Block Grant (CDBG)

(for Non-Homeless Service Providers)

Friday, January 14, 2022

9:00 a.m. - 11:00 a.m. One Government Center (1st Floor Lobby)

640 Jackson Street

Toledo, OH 43604

Emergency Solutions Grant (ESG)

(for Homeless Service Providers)

Friday, January 14, 2022

1:30 p.m. - 3:30 p.m.

One Government Center (1st Floor Lobby)

640 Jackson Street

Toledo, OH 43604

CDBG Application Zoom Training

Thursday, January 27, 2022 at 10:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/84754762282>

ESG Application Zoom Training

Friday, January 28, 2022 at 10:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/88509297752>

HOME NOFA Workshop (via Zoom)

Wednesday, January 26, 2022, at 10:00 a.m.

Zoom Link: <https://toledo-oh-gov.zoom.us/j/83035084101>

**THE DEADLINE FOR SUBMITTING CDBG AND ESG APPLICATIONS IS FRIDAY, FEBRUARY 11, 2022 AT 4:45 P.M.
THE DEADLINE FOR SUBMITTING THE HOME APPLICATION IS FRIDAY, FEBRUARY 11, 2022 AT 4:45 P.M.
COMPLETED APPLICATIONS MUST BE SUBMITTED THROUGH ZOOMGRANTS**

FOR CDBG/ESG: For additional information, please contact Monica Brown, Administrative Analyst IV, at:
monica.brown@toledo.oh.gov.

FOR HOME: For additional information, please contact Tiffanie McNair, Housing Commissioner, at:
tiffanie.mcnair@toledo.oh.gov.

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Amy Voigt

Communications Specialist
amy.voigt@toledo.oh.gov
cell 419-389-2260

Gretchen DeBacker

Director
gretchen.debacker@toledo.oh.gov
cell 419-297-7210

Marketing and Communications

One Government Center
Suite 2200
Toledo, Ohio 43604

toledo.oh.gov



JANUARY 10, 2022

City of Toledo Department of Neighborhoods Release 2022-2023 Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG) and HOME Investment Partnerships Program Application Availability

The City of Toledo announces the availability of federal funds for Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnership Program (HOME) for the 2022 Program Year (July 1, 2022 - June 30, 2023).

CDBG applications will be accepted with a priority for the following programs/activities:

Programs/Activities

Available Funding

Housing Preservation
Approximately \$1,000,000

Public Facilities and Infrastructure
Approximately \$1,000,000

Public Services (15%)
Approximately \$1,100,000

Eligible applicants: 501 (c) 3 organizations, other nonprofits and government agencies.

HOME applications will be accepted from certified City of Toledo Community Housing and Development Organizations (CHDO) for the following projects that demonstrate a gap in financing, address the City of Toledo's affordable and special populations homeownership needs, and leverage HOME funds with other funding sources.



Amy Voigt

Communications Specialist
amy.voigt@toledo.oh.gov
cell 419-389-2260

Gretchen DeBacker

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One Government Center
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➔ toledo.oh.gov



Projects

Maximum Award

Construction/Rehabilitation of Homebuyer Units (non-CHDO)
Approximately \$500,000

Construction/Rehabilitation of Homebuyer Units (CHDO)
Approximately \$330,000

**TO APPLY FOR FUNDING, APPLICANTS MUST PICK UP THEIR
APPLICATION MATERIAL**

ON THE FOLLOWING:

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(for Non-Homeless Service Providers)

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9:00 a.m. - 11:00 a.m.

One Government Center (1st Floor Lobby)

640 Jackson Street

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Friday, January 14, 2022

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One Government Center (1st Floor Lobby)

640 Jackson Street

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FOR CDBG/ESG: For additional information, please contact Monica Brown,
Administrative Analyst IV, at: monica.brown@toledo.oh.gov.



FOR HOME: For additional information, please contact Tiffanie McNair, Housing Commissioner, at: tiffanie.mcnaair@toledo.oh.gov.

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PUBLIC NOTICE

2022-2023 ONE-YEAR ACTION PLAN

To all interested agencies, groups, and persons:

The City of Toledo is seeking comments on its **Draft** July 1, 2022 – June 30, 2023 One-Year Action Plan to be submitted to the U.S. Department of Housing and Urban Development (HUD) on or before May 18, 2022. The One-Year Action Plan is based on the HUD-approved Five-Year 2020-2024 Consolidated Plan submitted by the City of Toledo for housing, community, and economic development.

The One-Year Action Plan includes a description of the federal funds anticipated to be received, as well as other resources expected to be available within the City of Toledo during the 2022-2023 program year. The Action Plan provides a description of the activities to be undertaken when using these resources and the expected results of those activities. Also, the Action Plan depicts a geographic distribution of assistance, special needs activities, general and public housing actions, and activities specific to the 2022 48th Year Community Development Block Grant (CDBG), 36th Year Emergency Solutions Grant (ESG), 31st Year HOME Investment Partnerships Program (HOME), the Neighborhood Stabilization Programs (NSP) (if applicable), and the 2020 Lead-Based Paint and Healthy Homes Grant. In addition, the Plan will contain HUD-required certifications, as well as a summary of the community input received at the public hearings regarding the Action Plan.

The **Draft** One-Year Action Plan will be available for review beginning **Wednesday, March 23, 2022**, on the website of the following entities:

Department of Housing and Community Development
One Government Center, 18th Floor
Downtown Toledo, Jackson & Erie Streets
website: <https://toledo.oh.gov/departments/neighborhoods>

Lucas Metropolitan Housing
435 Nebraska Avenue
Toledo, Ohio 43604
website: www.lucasmha.org

Office of the Mayor
One Government Center, 22nd Floor
Downtown Toledo, Jackson & Erie Streets
website: <https://toledo.oh.gov/government/mayor>

Toledo Lucas County Homelessness Board
1220 Madison Avenue
Toledo, Ohio 43604
website: www.endinghomelessness Toledo.org

Clerk of Council
One Government Center, 21st Floor
Downtown Toledo, Jackson & Erie Streets
website: <https://toledo.oh.gov/government/city-council/>

Toledo-Lucas County Public Library
325 Michigan Street
Toledo, Ohio 43604
website: www.toledolibrary.org

The Fair Housing Center
326 N. Erie Street
Toledo, Ohio 43604
website: www.toledofhc.org

Lucas Co. Board of Developmental Disabilities
1154 Larc Lane
Toledo, Ohio 43614
website: www.lucasdd.info

Public hearings on the **Draft** One-Year Action Plan are scheduled as follows:

Thursday, March 24, 2022, 5:30 p.m. by Virtual Hearing:

Virtual Link: <https://toledo-oh-gov.zoom.us/j/83155435016>

Passcode: 746318

Or Telephone:

Dial: USA 216 706 7052 US Toll

USA 866 528 2256 US Toll-free

Conference code: 800378

Thursday, March 31, 2022, 5:30 p.m. by Virtual Hearing:

Virtual Link: <https://toledo-oh-gov.zoom.us/j/83761090786>

Passcode: 961385

Or Telephone:

Dial: USA 216 706 7052 US Toll

USA 866 528 2256 US Toll-free

Conference code: 800378

The City of Toledo will also receive comments from the public in writing beginning Wednesday, March 23, 2022 through Thursday, April 21, 2022, at the following address:

CITY OF TOLEDO
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
2022-2023 ONE-YEAR ACTION PLAN
ONE GOVERNMENT CENTER, SUITE 1800
TOLEDO, OHIO 43604

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The Sojourner's Truth

CLASSIFIEDS

Page 14

March 2, 2022

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Legal Notices

**PUBLIC NOTICE
2022-2023 ONE-YEAR ACTION PLAN**

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325 Michigan Street
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Lucas Co. Board of Developmental Disabilities
1154 Love Lane
Toledo, Ohio 43614
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Thursday, March 24, 2022, 5:30 p.m.
by Virtual Hearing: Virtual Link: <https://toledo-oh-gov.zoom.us/j/83761090766>
Passcode: 746318
Or Telephone:
Dial: USA 216 706 7052 US Toll
USA 866 528 2255 US Toll-free
Conference code: 800378

Thursday, March 31, 2022, 5:30 p.m.
by Virtual Hearing: Virtual Link: <https://toledo-oh-gov.zoom.us/j/83761090766>
Passcode: 961885
Or Telephone:
Dial: USA 216 706 7052 US Toll
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#618102

Brown, Monica

From: Thorpe, Susan
Sent: Friday, March 4, 2022 10:08 AM
To: EAST TOLEDO FAMILY CENTER; HELPING HANDS OF; LEGAL AID OF WESTERN OHIO, INC.; 'mhoffman@nhainc.org'; mlk.kitchen@att.net; 'mmcintyre@mvhabitat.org'; 'mwolff_etsac@yahoo.com'; NEIGHBORHOOD HEALTH ASSOCIATION, IN; 'scrabtree@ablelaw.org'; TOLEDO SEAGATE; NEIGHBORWORKS TOLEDO REGION; NEIGHBORWORKS TOLEDO REGION; 'Yvonne Dubielak'; Zgodzinski, Eric; 'vmartinez@lawolaw.org'; 'rschuster@toledodiocese.org'; 'believecenter@yahoo.com'; 'jhabib@spcc-toledo.org'; 'dargatza@co.lucas.oh.us'; 'jb_sqacc@yahoo.com'; 'Jeff Swiech'; 'believecenter@gmail.com'; 'emcpartland@mvhabitat.org'; 'GrantWriter'; 'mindy@seagatefoodbank.org'; 'Kachinger@mvhabitat.org'; 'DeniseF@auroraprojectinc.org'; 'rjordan@pathwaytoledo.org'; 'eod.sqacc@gmail.com'; 'matt.morris@unitedwaytoledo.org'; 'jodig@etfc.org'; 'cfellman@ablelaw.org'; 'dstefansky@toledodiocese.org'; 'antduran8213@gmail.com'; 'LindaSkowronek@toledofhc.org'; 'carol.gray@toledogrows.org'; 'wendy.pesttrue@unitedwaytoledo.org'; 'cmiller@pathwaytoledo.org'; 'gcommu8708@bex.net'; 'pageelaine1@aol.com'; 'tamholliker@aol.com'; 'Marc D. Folk'; 'jjarrett@theartscommission.org'; 'mculling@theartscommission.org'; 'rbunch@theartscommission.org'; 'cwilson@preferred-properties.org'; 'sfriedman@toledofhc.org'; 'dpeluso@familyhousetoledo.org'; 'jfrost@nhainc.org'; 'mcassidy@preferred-properties.org'; 'msachs@nwtoledo.org'; 'lweller@lawolaw.org'; 'sshrewsbury@toledodiocese.org'; Welch, David; 'mariemflannery@toledofhc.org'; 'lpengov@spcc-toledo.org'; 'Tonia Pace'; 'dalexander@familyhousetoledo.org'; 'mjacomet@nwtoledo.org'; 'jacksonv@co.lucas.oh.us'; 'anneruch@gmail.com'; 'zach.steinmetz@ampf.com'; 'jmpinskey@gmail.com'; 'nancy.elzinga@gmail.com'; 'kbond@lucasmha.org'; 'Vonzelle Hill'; 'Scott Herr'; 'rgagnon@tlchb.org'; 'jcintronvega@lucasmha.org'; 'grantsadministrator@tlchb.org'; 'elaina@believecenter.org'; 'janeltate@gmail.com'; 'jblack@pathwaytoledo.org'; 'eellis@toledodesigncollective.org'; 'Martin Jarret'; 'paul@toledodesigncollective.org'; 'dmann@co.lucas.oh.us'; Brownlee, Shantae; 'sshackelford@co.lucas.oh.us'; Stone, Robin; 'gthomas@toledofhc.org'; Kristie Clark; Patricia Allison; 'byoung@preferred-properties.org'; 'dvasquez@preferred-properties.org'; Michael Jewell; 'mhart@tlchb.org'; 'hzeller@lucasmha.org'; 'rgagnon@lucasmha.org'; 'stokest@co.lucas.oh.us'; 'frankt@co.lucas.oh.us'; Candace Bishop; Nekiesha Taylor; 'ryan.bunch@gmail.com'; Lisa Banks; Jennifer Jacobs; Jeff De Lay; Natalie Ludwick; Inna Kinney; April Welch; 'cjamato1@gmail.com'; Mike Badik; Linda Parra
Cc: Bonds, Bonita; Brown, Monica; Harris, Morlon; Phillips, Regina; Williams, Darlene; Clemens, Rosalyn
Subject: 2022-2023 One-Year Action Plan Public Notice
Attachments: 2022-2023 Action Plan Public Notice.doc
Importance: High

Good morning,

The City of Toledo, Department of Housing and Community Development has scheduled two (2) public hearings on the Draft 2022-2023 One-Year Action Plan. The One-Year Action Plan includes a description of the federal funds anticipated to be received and other resources expected to be available within the City of Toledo

during the 2022-2023 program year. The Action Plan is based on the HUD-approved Five-Year 2020-2024 Consolidated Plan submitted by the City of Toledo for housing, community, and economic development.

You are invited to attend the public hearings on the One-Year Action Plan.

The public hearings are scheduled as follows:

Thursday, March 24, 2022, 5:30 p.m. by Virtual Hearing:

Virtual Link: <https://toledo-oh-gov.zoom.us/j/83155435016>

Passcode: 746318

Or Telephone:

Dial: USA 216 706 7052 US Toll

USA 866 528 2256 US Toll-free

Conference code: 800378

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Passcode: 961385

Or Telephone:

Dial: USA 216 706 7052 US Toll

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Conference code: 800378

The Draft 2022-2023 One-Year Action Plan will be available for review on the City's website beginning **Wednesday, March 23, 2022**, at <https://toledo.oh.gov/departments/neighborhoods> .

Please see attached for further information.

*Susan Thorpe
Clerk Specialist II
City of Toledo
Department of Housing and Community Development
One Government Center, Suite 1800
Toledo, OH 43604
(419) 245-1441 (office)
(419) 245-1192 (fax)
susan.thorpe@toledo.oh.gov*

Visit us at: www.toledo.oh.gov

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One Government Center, 18th Floor
Downtown Toledo, Jackson & Erie Streets
website: <https://toledo.oh.gov/departments/neighborhoods>

Lucas Metropolitan Housing
435 Nebraska Avenue
Toledo, Ohio 43604
website: www.lucasmha.org

Office of the Mayor
One Government Center, 22nd Floor
Downtown Toledo, Jackson & Erie Streets
website: <https://toledo.oh.gov/government/mayor>

Toledo Lucas County Homelessness Board
1220 Madison Avenue
Toledo, Ohio 43604
website: www.endinghomelessness Toledo.org

Clerk of Council
One Government Center, 21st Floor
Downtown Toledo, Jackson & Erie Streets
website: <https://toledo.oh.gov/government/city-council/>

Toledo-Lucas County Public Library
325 Michigan Street
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website: www.toledolibrary.org

The Fair Housing Center
326 N. Erie Street
Toledo, Ohio 43604
website: www.toledofhc.org

Lucas Co. Board of Developmental Disabilities
1154 Larc Lane
Toledo, Ohio 43614
website: www.lucasdd.info

Public hearings on the **Draft** One-Year Action Plan are scheduled as follows:

Thursday, March 24, 2022, 5:30 p.m. by Virtual Hearing:

Virtual Link: <https://toledo-oh-gov.zoom.us/j/83155435016>

Passcode: 746318

Or Telephone:

Dial: USA 216 706 7052 US Toll

USA 866 528 2256 US Toll-free

Conference code: 800378

Thursday, March 31, 2022, 5:30 p.m. by Virtual Hearing:

Virtual Link: <https://toledo-oh-gov.zoom.us/j/83761090786>

Passcode: 961385

Or Telephone:

Dial: USA 216 706 7052 US Toll

USA 866 528 2256 US Toll-free

Conference code: 800378

The City of Toledo will also receive comments from the public in writing beginning Wednesday, March 23, 2022 through Thursday, April 21, 2022, at the following address:

CITY OF TOLEDO
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
2022-2023 ONE-YEAR ACTION PLAN
ONE GOVERNMENT CENTER, SUITE 1800
TOLEDO, OHIO 43604

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[Notice of Funding Available](#)

[Brownfield Community Wide Assessment Grant Application](#)

[Department of Housing and Community Development submits Substantial Amendment to the 2020 Five-Year Consolidated](#)

Notice of Hearings on HUD One-Year Action Plan

 Friday, March 04, 2022

The City of Toledo is seeking comments on its **draft** July 1, 2022 – June 30, 2023 One-Year Action Plan to be submitted to the U.S. Department of Housing and Urban Development (HUD) on or before May 18, 2022. The One-Year Action Plan is based on the HUD-approved Five-Year 2020-2024 Consolidated Plan submitted by the City of Toledo for housing, community, and economic development.

The One-Year Action Plan includes a description of the federal funds anticipated to be received, as well as other resources expected to be available within the City of Toledo during the 2022-2023 program year. The Action Plan provides a description of the activities to be undertaken when using these resources and the expected results of those activities. Also, the Action Plan depicts a geographic distribution of assistance, special needs activities, general and public housing actions, and activities specific to the 2022 48th Year Community Development Block Grant (CDBG), 36th Year Emergency Solutions Grant (ESG), 31st Year HOME Investment

Plan and 2021 Annual Action Plan

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Partnerships Program (HOME), the Neighborhood Stabilization Programs (NSP) (if applicable), and the 2020 Lead-Based Paint and Healthy Homes Grant. In addition, the Plan will contain HUD-required certifications, as well as a summary of the community input received at the public hearings regarding the Action Plan.

The **draft** One-Year Action Plan will be available for review beginning **Wednesday, March 23, 2022**, on the website of the following entities:

[Department of Housing and Community Development](#)

One Government Center, Suite 1800
Toledo, Ohio 43604

[Office of the Mayor](#)

One Government Center, Suite 2200
Toledo, Ohio 43604

[Clerk of Council](#)

One Government Center, Suite 2100
Toledo, Ohio 43604

[The Fair Housing Center](#)

432 N. Superior St.
Toledo, Ohio 43604

[Lucas Metropolitan Housing](#)

435 Nebraska Ave.
Toledo, Ohio 43604

[Toledo-Lucas County Homelessness Board](#)

1946 N. 13th St., Suite 437
Toledo, Ohio 43604





[Toledo-Lucas County Public Library](#)





325 Michigan St.
Toledo, Ohio 43604

[Lucas County Board of Developmental Disabilities](#)

1154 Larc Ln.
Toledo, Ohio 43614

Public hearings on the **draft** One-Year Action Plan are scheduled as follows:

 **March 24, 2022**
 5:30 p.m.
 Virtual Hearing
 [Join Zoom meeting](#)

 **March 31, 2022**
 5:30 p.m.
 Virtual Hearing
 [Join Zoom meeting](#)

The City of Toledo will also receive comments from the public in writing beginning **Wednesday, March 23, 2022** through **Thursday, April 21, 2022**, at the following address:

City of Toledo

Department of Housing and Community Development
2022-2023 One-Year Action Plan
One Government Center, Suite 1800
Toledo, Ohio 43604

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DEPARTMENT**



TARTA



One Government Center
640 Jackson Street, Toledo, OH 43604



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Brown, Monica

From: Thorpe, Susan
Sent: Tuesday, March 8, 2022 1:33 PM
To: EAST TOLEDO FAMILY CENTER; HELPING HANDS OF; LEGAL AID OF WESTERN OHIO, INC.; 'mhoffman@nhainc.org'; mlk.kitchen@att.net; 'mmcintyre@mvhabitat.org'; 'mwolff_etsac@yahoo.com'; NEIGHBORHOOD HEALTH ASSOCIATION, IN; 'scrabtree@ablelaw.org'; TOLEDO SEAGATE; NEIGHBORWORKS TOLEDO REGION; NEIGHBORWORKS TOLEDO REGION; 'Yvonne Dubielak'; Zgodzinski, Eric; 'vmartinez@lawolaw.org'; 'rschuster@toledodiocese.org'; 'believecenter@yahoo.com'; 'jhabib@spcc-toledo.org'; 'dargatza@co.lucas.oh.us'; 'jb_sqacc@yahoo.com'; 'Jeff Swiech'; 'believecenter@gmail.com'; 'emcpartland@mvhabitat.org'; 'GrantWriter'; 'mindy@seagatefoodbank.org'; 'Kachinger@mvhabitat.org'; 'DeniseF@auroraprojectinc.org'; 'rjordan@pathwaytoledo.org'; 'eod.sqacc@gmail.com'; 'matt.morris@unitedwaytoledo.org'; 'jodig@etfc.org'; 'cfellman@ablelaw.org'; 'dstefansky@toledodiocese.org'; 'antduran8213@gmail.com'; 'LindaSkowronek@toledofhc.org'; 'carol.gray@toledogrows.org'; 'wendy.pesttrue@unitedwaytoledo.org'; 'cmiller@pathwaytoledo.org'; 'gcommu8708@bex.net'; 'pageelaine1@aol.com'; 'tamholliker@aol.com'; 'Marc D. Folk'; 'jjarrett@theartscommission.org'; 'mculling@theartscommission.org'; 'rbunch@theartscommission.org'; 'cwilson@preferred-properties.org'; 'sfriedman@toledofhc.org'; 'dpeluso@familyhousetoledo.org'; 'jfrost@nhainc.org'; 'mcassidy@preferred-properties.org'; 'msachs@nwtoledo.org'; 'lweller@lawolaw.org'; 'sshrewsbury@toledodiocese.org'; Welch, David; 'mariemflannery@toledofhc.org'; 'lpengov@spcc-toledo.org'; 'Tonia Pace'; 'dalexander@familyhousetoledo.org'; 'mjacomet@nwtoledo.org'; 'jacksonv@co.lucas.oh.us'; 'anneruch@gmail.com'; 'zach.steinmetz@ampf.com'; 'jmpinskey@gmail.com'; 'nancy.elzinga@gmail.com'; 'kbond@lucasmha.org'; 'Vonzelle Hill'; 'Scott Herr'; 'jcintronvega@lucasmha.org'; 'grantsadministrator@tlchb.org'; 'elaina@believecenter.org'; 'janeltate@gmail.com'; 'jblack@pathwaytoledo.org'; 'eellis@toledodesigncollective.org'; 'Martin Jarret'; 'paul@toledodesigncollective.org'; 'dmann@co.lucas.oh.us'; Brownlee, Shantae; 'sshackelford@co.lucas.oh.us'; Stone, Robin; 'gthomas@toledofhc.org'; Kristie Clark; Patricia Allison; 'byoung@preferred-properties.org'; 'dvasquez@preferred-properties.org'; Michael Jewell; 'mhart@tlchb.org'; 'hzeller@lucasmha.org'; 'rgagnon@lucasmha.org'; 'stokest@co.lucas.oh.us'; 'frankt@co.lucas.oh.us'; Candace Bishop; Nekiesha Taylor; 'ryan.bunch@gmail.com'
Cc: Bonds, Bonita; Brown, Monica; Harris, Morlon; Phillips, Regina; Williams, Darlene
Subject: FW: Media Release: City of Toledo Announces Public Hearings and Comment Period for Annual Action Plan
Attachments: Housing .pdf; ATT00001.htm

Good afternoon,

Please see the media release below.

Susan Thorpe
Clerk Specialist II
City of Toledo
Department of Housing and Community Development
One Government Center, Suite 1800
Toledo, OH 43604

(419) 245-1441 (office)
(419) 245-1192 (fax)
susan.thorpe@toledo.oh.gov

Visit us at: www.toledo.oh.gov

From: DeBacker, Gretchen
Sent: Tuesday, March 8, 2022 1:23 PM
Subject: Media Release: City of Toledo Announces Public Hearings and Comment Period for Annual Action Plan

March 8, 2022

Contact: Gretchen DeBacker, Director of Marketing and Communications
419-297-7210

City of Toledo Announces Public Hearings and Comment Period for Annual Action Plan

Toledo, OH (March 8, 2022) – The City of Toledo’s Department of Housing and Community Development is seeking comments on its **Draft** July 1, 2022 – June 30, 2023 One-Year Action Plan to be submitted to the U. S. Department of Housing and Urban Development (HUD). The One-Year Action Plan is based on the HUD-approved Five-Year 2020-2024 Consolidated Plan submitted by the City of Toledo for housing, community, and economic development.

The One-Year Action Plan includes a description of the federal funds anticipated to be received, as well as other resources expected to be available within the City of Toledo during the 2022-2023 program year. The Action Plan provides a description of the activities to be undertaken when using these resources and the expected results of those activities. Also, the Action Plan depicts a geographic distribution of assistance, special needs activities, general and public housing actions, and activities specific to the 2022 48th Year Community Development Block Grant (CDBG), 36th Year Emergency Solutions Grant (ESG), 31st Year HOME Investment Partnerships Program (HOME), the Neighborhood Stabilization Programs (NSP) (if applicable), and the 2020 Lead-Based Paint and Healthy Homes Grant. In addition, the Plan will contain HUD-required certifications, as well as a summary of the community input received at the public hearings regarding the Action Plan.

The **Draft** One-Year Action Plan will be available for review beginning **Wednesday, March 23, 2022**, on the website of the following entities:

Department of Housing and Community Development One Government Center, 18th Floor
Downtown Toledo, Jackson & Erie Streets
website: <https://toledo.oh.gov/departments/neighborhoods>

Office of the Mayor
One Government Center, 22nd Floor
Downtown Toledo, Jackson & Erie Streets website: <https://toledo.oh.gov/government/mayor>

Clerk of Council
One Government Center, 21st Floor
Downtown Toledo, Jackson & Erie Streets
website: <https://toledo.oh.gov/government/city-council/>

The Fair Housing Center 326 N. Erie Street
Toledo, Ohio 43604 website: www.toledofhc.org

Public hearings on the **Draft** One-Year Action Plan are scheduled as follows:

Thursday, March 24, 2022, 5:30 p.m. by Virtual Hearing:

Virtual Link: <https://toledo-oh-gov.zoom.us/j/83155435016> Passcode: 746318
Or Telephone:

Dial: USA 216 706 7052 US Toll USA 866 528 2256 US Toll-free

Conference code: 800378

Thursday, March 31, 2022, 5:30 p.m. by Virtual Hearing:

Virtual Link: <https://toledo-oh-gov.zoom.us/j/83761090786> Passcode: 961385

Or Telephone:

Dial: USA 216 706 7052 US Toll USA 866 528 2256 US Toll-free

Lucas Metropolitan Housing 435 Nebraska Avenue Toledo, Ohio 43604 website: www.lucasmha.org

Toledo Lucas County Homelessness Board 1220 Madison Avenue
Toledo, Ohio 43604

website: www.endinghomelessness.toledo.org

Toledo-Lucas County Public Library 325 Michigan Street

Toledo, Ohio 43604

website: www.toledolibrary.org

Lucas Co. Board of Developmental Disabilities 1154 Larc Lane

Toledo, Ohio 43614

website: www.lucasdd.info

Conference code: 800378

The City of Toledo will also receive comments from the public in writing beginning **Wednesday, March 23, 2022** through **Thursday, April 21, 2022**, at the following address:

CITY OF TOLEDO

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT 2022-2023 ONE-YEAR ACTION PLAN

ONE GOVERNMENT CENTER, SUITE 1800

TOLEDO, OHIO 43604

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Media Advisory

Media Contact

Gretchen DeEcker

Acting Communications Director

email: gretchen.deecker@cityoftoledo.org

cell: 419-245-7230

office: 419-245-6000

toledo.oh.gov

cityoftoledo

city_of_toledo

MARCH 8, 2022

City of Toledo Announces Public Hearings and Comment Period for Annual Action Plan

Toledo, OH (March 7, 2022) – The City of Toledo’s Department of Housing and Community Development is seeking comments on its **Draft July 1, 2022 – June 30, 2023 One-Year Action Plan** to be submitted to the U. S. Department of Housing and Urban Development (HUD). The One-Year Action Plan is based on the HUD-approved Five-Year 2020-2024 Consolidated Plan submitted by the City of Toledo for housing, community, and economic development.

The One-Year Action Plan includes a description of the federal funds anticipated to be received, as well as other resources expected to be available within the City of Toledo during the 2022-2023 program year. The Action Plan provides a description of the activities to be undertaken when using these resources and the expected results of those activities. Also, the Action Plan depicts a geographic distribution of assistance, special needs activities, general and public housing actions, and activities specific to the 2022 48th Year Community Development Block Grant (CDBG), 36th Year Emergency Solutions Grant (ESG), 31st Year HOME Investment Partnerships Program (HOME), the Neighborhood Stabilization Programs (NSP) (if applicable), and the 2020 Lead-Based Paint and Healthy Homes Grant. In addition, the Plan will contain HUD-required certifications, as well as a summary of the community input received at the public hearings regarding the Action Plan.

The **Draft** One-Year Action Plan will be available for review beginning **Wednesday, March 23, 2022**, on the website of the following entities:

Department of Housing and Community Development One
Government Center, 18th Floor
Downtown Toledo, Jackson & Erie Streets
website: <https://toledo.oh.gov/departments/neighborhoods>



Media Advisory

Media Contact

Gretchen DeEcker

Acting Communications Director

gdecker@cityoftoledo.org

cell 419-291-7230

office 419-245-6000

toledo.oh.gov

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Office of the Mayor

One Government Center, 22nd Floor

Downtown Toledo, Jackson & Erie Streets website: <https://toledo.oh.gov/government/mayor>

Clerk of Council

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The Fair Housing Center 326 N. Erie Street

Toledo, Ohio 43604 website: www.toledofhc.org

Public hearings on the **Draft** One-Year Action Plan are scheduled as follows:

Thursday, March 24, 2022, 5:30 p.m. by Virtual Hearing:

Virtual Link: <https://toledo-oh-gov.zoom.us/j/83155435016>

Passcode: 746318

Or Telephone:

Dial: USA 216 706 7052 US Toll USA 866 528 2256 US Toll-free

Conference code: 800378

Thursday, March 31, 2022, 5:30 p.m. by Virtual Hearing:

Virtual Link: <https://toledo-oh-gov.zoom.us/j/83761090786>

Passcode: 961385

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Dial: USA 216 706 7052 US Toll USA 866 528 2256 US Toll-free

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Media Advisory

Media Contact

Gretchen DeEcker

Acting Communications Director

gdecker@cityoftoledo.org

cell (419) 245-6000

office (419) 245-6000

toledo.oh.gov

[cityoftoledo](https://www.facebook.com/cityoftoledo)

[city_of_toledo](https://www.instagram.com/city_of_toledo)

Lucas Co. Board of Developmental Disabilities 1154 Larc Lane
Toledo, Ohio 43614
website: www.lucasdd.info

Conference code: 800378

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CITY OF TOLEDO
DEPARTMENT OF HOUSING AND COMMUNITY
DEVELOPMENT 2022-2023 ONE-YEAR ACTION PLAN
ONE GOVERNMENT CENTER, SUITE 1800
TOLEDO, OHIO 43604

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Brown, Monica

From: Thorpe, Susan
Sent: Monday, March 21, 2022 10:40 AM
To: EAST TOLEDO FAMILY CENTER; HELPING HANDS OF; LEGAL AID OF WESTERN OHIO, INC.; 'mhoffman@nhainc.org'; 'mlk.kitchen@att.net'; 'mmcintyre@mvhabitat.org'; 'mwolff_etsac@yahoo.com'; NEIGHBORHOOD HEALTH ASSOCIATION, IN; 'scrabtree@ablelaw.org'; TOLEDO SEAGATE; NEIGHBORWORKS TOLEDO REGION; NEIGHBORWORKS TOLEDO REGION; 'Yvonne Dubielak'; 'Zgodzinski, Eric'; 'vmartinez@lawolaw.org'; 'rschuster@toledodiocese.org'; 'believecenter@yahoo.com'; 'jhabib@spcc-toledo.org'; 'dargatza@co.lucas.oh.us'; 'jb_sqacc@yahoo.com'; 'Jeff Swiech'; 'believecenter@gmail.com'; 'emcpartland@mvhabitat.org'; 'GrantWriter'; 'mindy@seagatefoodbank.org'; 'Kachinger@mvhabitat.org'; 'DeniseF@auroraprojectinc.org'; 'rjordan@pathwaytoledo.org'; 'eod.sqacc@gmail.com'; 'matt.morris@unitedwaytoledo.org'; 'jodig@etfc.org'; 'cfellman@ablelaw.org'; 'dstefansky@toledodiocese.org'; 'antduran8213@gmail.com'; 'LindaSkowronek@toledofhc.org'; 'carol.gray@toledogrows.org'; 'wendy.pesttrue@unitedwaytoledo.org'; 'cmiller@pathwaytoledo.org'; 'gcommu8708@bex.net'; 'pageelaine1@aol.com'; 'tamholliker@aol.com'; 'Marc D. Folk'; 'jjarrett@theartscommission.org'; 'mculling@theartscommission.org'; 'rbunch@theartscommission.org'; 'cwilson@preferred-properties.org'; 'sfriedman@toledofhc.org'; 'dpeluso@familyhousetoledo.org'; 'jfrost@nhainc.org'; 'mcassidy@preferred-properties.org'; 'msachs@nwtoledo.org'; 'lweller@lawolaw.org'; 'sshrewsbury@toledodiocese.org'; 'Welch,David'; 'mariemflannery@toledofhc.org'; 'lpengov@spcc-toledo.org'; 'Tonia Pace'; 'dalexander@familyhousetoledo.org'; 'mjacomet@nwtoledo.org'; 'jacksonv@co.lucas.oh.us'; 'anneruch@gmail.com'; 'zach.steinmetz@ampf.com'; 'jmpinskey@gmail.com'; 'nancy.elzinga@gmail.com'; 'kbond@lucasmha.org'; 'Vonzelle Hill'; 'Scott Herr'; 'rgagnon@tlchb.org'; 'jcintronvega@lucasmha.org'; 'grantsadministrator@tlchb.org'; 'elaina@believecenter.org'; 'janeltate@gmail.com'; 'jblack@pathwaytoledo.org'; 'eellis@toledodesigncollective.org'; 'Martin Jarret'; 'paul@toledodesigncollective.org'; 'dmann@co.lucas.oh.us'; Brownlee, Shantae; 'sshackelford@co.lucas.oh.us'; Stone, Robin; 'gthomas@toledofhc.org'; Kristie Clark; Patricia Allison; 'byoung@preferred-properties.org'; 'dvasquez@preferred-properties.org'; Michael Jewell; 'mhart@tlchb.org'; 'hzeller@lucasmha.org'; 'rgagnon@lucasmha.org'; 'stokest@co.lucas.oh.us'; 'frankt@co.lucas.oh.us'; Candace Bishop; Nekiesha Taylor; 'ryan.bunch@gmail.com'; Lisa Banks; Jennifer Jacobs; Jeff De Lay; Natalie Ludwick; Inna Kinney; April Welch; 'cjamato1@gmail.com'; Mike Badik; Linda Parra
Cc: Bonds, Bonita; Brown, Monica; Harris, Morlon; Phillips, Regina; Williams, Darlene; Clemens, Rosalyn
Subject: 2022-2023 One-Year Action Plan Public Notice
Attachments: 2022-2023 Action Plan Public Notice.doc
Importance: High

Good morning,

Just a friendly reminder -

The City of Toledo, Department of Housing and Community Development has scheduled two (2) public hearings on the Draft 2022-2023 One-Year Action Plan. The One-Year Action Plan includes a description of the federal funds anticipated to be received and other resources expected to be available within the City of Toledo during the 2022-2023 program year. The Action Plan is based on the HUD-approved Five-Year 2020-2024 Consolidated Plan submitted by the City of Toledo for housing, community, and economic development.

You are invited to attend the public hearings on the One-Year Action Plan.

The public hearings are scheduled as follows:

Thursday, March 24, 2022, 5:30 p.m. by Virtual Hearing:

Virtual Link: <https://toledo-oh-gov.zoom.us/j/83155435016>

Passcode: 746318

Or Telephone:

Dial: USA 216 706 7052 US Toll

USA 866 528 2256 US Toll-free

Conference code: 800378

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Passcode: 961385

Or Telephone:

Dial: USA 216 706 7052 US Toll

USA 866 528 2256 US Toll-free

Conference code: 800378

The Draft 2022-2023 One-Year Action Plan will be available for review on the City's website beginning **Wednesday, March 23, 2022**, at <https://toledo.oh.gov/departments/housing-community-development>

Please see attached for further information.

*Susan Thorpe
Clerk Specialist II
City of Toledo
Department of Housing and Community Development
One Government Center, Suite 1800
Toledo, OH 43604
(419) 245-1441 (office)
(419) 245-1192 (fax)
susan.thorpe@toledo.oh.gov*

Visit us at: www.toledo.oh.gov

PUBLIC NOTICE

2022-2023 ONE-YEAR ACTION PLAN

To all interested agencies, groups, and persons:

The City of Toledo is seeking comments on its **Draft** July 1, 2022 – June 30, 2023 One-Year Action Plan to be submitted to the U.S. Department of Housing and Urban Development (HUD) on or before May 18, 2022. The One-Year Action Plan is based on the HUD-approved Five-Year 2020-2024 Consolidated Plan submitted by the City of Toledo for housing, community, and economic development.

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DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
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Toledo City Council
Neighborhoods & Community
Development Committee

Councilwoman Tiffany Whitman, Chair
Council Member Theresa Gadus, Vice Chair

will conduct a Committee Meeting on

Thursday, April 7, 2022
Government Center – Council Chambers
2:00 PM

The purpose of the meeting is to discuss:

- **Department of Neighborhoods Update,
Director Rosalyn Clemens**
- **City of Toledo 2022 Clean Toledo
Drop-Off Refuse and Recycling Events,
Commissioner Dennis Kennedy**
- **Right to Counsel Update,
Taylor Burns, LAWO**

Any other matter that may properly come before the Committee

The Clerk of Council's Office supports the provisions of the Americans' with Disabilities Act. If you need special accommodations, please call 48 hours prior to meeting time at (419) 245-1060 for arrangements.

###

FAIR HOUSING

Fair Housing Action Plan:

July – December 2021 Update

According to HUD's guidance, the plan to address the impediments should:

- List fair housing action(s) to be completed for each objective.
- Determine the time period for completion.
- Identify resources from local, State, and Federal agencies or programs as well as from financial, nonprofit, and other organizations that have agreed to finance or otherwise support fair housing actions.
- Identify individuals, groups, and organizations to be involved in each action and define their responsibilities. Obtain written commitments from all involved, as a formal recognition of their agreement to participate in the effort in the manner indicated. HUD recommends that jurisdictions specify these commitments in the appropriate contracts that may arise in connection with the fair housing actions.
- Set priorities. Schedule actions for a time period which is consistent with the Consolidated Plan cycle.¹

Consistent with HUD's guidelines, the action plan provided here will help guide the City of Toledo to address the identified local impediments to fair housing.

Action Plan Format and Explanation

The action plan provided on the following pages is organized into charts covering each of the identified goals to address Fair Housing Impediments. Each chart provides objectives as required by HUD's guidelines, City departments with appropriate responsibilities, information about the potential involvement of other partner institutions including The Fair Housing Center, and suggested deadlines for completion. Under chart, space is provided for discussion. As the City moves forward, this "discussion" space will provide notes on progress made or potential changes, or suggestions for changes, to the action plan.

¹ *Id.*

Fair Housing Issue: Criminal History Screening

Goal: Ban the box policy

Measurable Objectives	City Department Responsible	Other Institutions	TFHC's role	Deadline
Complete initial meeting	City staff should consult with City Council and then schedule an initial meeting to evaluate	RCNO	TFHC will attend initial meeting	First half of FY 2020
Develop schedule for next steps in evaluation	Leadership, meeting space, encouragement	RCNO, other groups as determined	TFHC will provide technical assistance and support	Second half of FY 2020
Draft legislation	City's law department will assist		TFHC may provide review and technical assistance	Second half of FY 2020
Introduce legislation to City Council	City Council and Mayor's office seeks introduction			First quarter of 2021
Complete hearings and final council vote on the issue	City Council	RCNO and other groups to provide public support	TFHC may provide support and technical assistance	First quarter of 2022

Discussion:

Reporting period: July – September 2020 & October – December 2020

No updates this reporting period.

Reporting period: January – March 2021 & April – June 2021

- Community partners and several City Council representatives have been meeting regularly to discuss policies and legislation that will improve housing stability for tenants by expanding access to safe, affordable, quality housing. Discussion has included consideration of an ordinance that would limit the criteria housing providers use to screen tenants, including restrictions on use of

criminal history. The group advocates for legislation that would ensure housing providers' tenant selection policies comply with 2016 HUD guidelines regarding criminal history screening, including evaluation of the nature of offenses to determine whether they demonstrate a risk to the safety of the property or residents. These types of policies help to prevent unfair denial of housing to applicants who would otherwise qualify and increase the availability of housing for individuals returning from incarceration.

- In June 2021, HUD released a memo outlining plans to improve access to stable housing for reentry by increasing the availability of housing vouchers, providing tools and guidance to housing providers to ensure tenant selection plans are consistent with 2016 HUD guidelines regarding criminal history screening, evaluating HUD's policies to identify barriers for reentry, and making information about best practices more widely available.

Reporting period: July - September 2021 & October - December 2021

No updates this reporting period.

Fair Housing Issue: Criminal History Screening

Goal: Set aside affordable housing opportunities

Measurable objectives	City Department Responsible	Other Institutions	TFHC's role	Deadline
Complete initial meeting	City staff to schedule meeting and review potential for unit set asides with LMH	LMH	TFHC will attend initial meeting	First half of FY 2020
Develop schedule for next steps in evaluation	City staff to provide assistance and follow through to ensure progress	LMH	TFHC may provide assistance in determining next steps	Second half of FY 2020
Determine number of hard units and vouchers to be set aside	In consultation with LMH, determine a projection for potential set aside of units and vouchers	LMH		Second half of FY 2020
Set target time for roll out of set aside	City staff to track	LMH	TFHC may also monitor	First quarter of 2021

Discussion:

Reporting period: July – September 2020 & October – December 2020

Update from LMH: The Ridge Project is designed to provide vouchers to the re-entry population. This program in initial phase.

Reporting period: January – March 2021 & April – June 2021

Update from LMH:

- For the Emergency Voucher Program, HUD allowed PHAs, like LMH, to waive certain requirements in the Admin. Plan related to prior criminal activity. LMH has accepted those waivers.
- LMH is also in process of a review of the Admin. Plan in its entirety. That process will include a review, and likely revision to the look back period, so that it matches the standard set in the ACOP. That is likely to be done within next year as LMH has had a large turn over in leadership within the HCV program.

Reporting period: July - September 2021 & October - December 2021

Update from LMH: Emergency Voucher Program is still moving forward, more updates expected next quarter.

Fair Housing Issue: Criminal History Screening
Goal: Private housing provider compliance

Measurable objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Develop and review plans for outreach	Provide support to TFHC	LMH	With available resources, will perform outreach	Second half of FY 2020
Develop and implement plans for enforcement	Provide support to TFHC		With available resources, enforce Fair Housing laws	Second half of FY 2020

Discussion:

Reporting period: July – September 2020 & October – December 2020

TFHC drafted a model criminal history screening policy for housing providers that complies with HUD's 2016 guidelines. This document can serve as a template that housing providers can adopt or use as a guide to develop their own criminal history screening policy that aligns with fair housing recommendations. TFHC plans to share this policy more widely with contacts in the reentry community as well as with housing providers during its regular fair housing training sessions.

Reporting period: January – March 2021 & April – June 2021

- Community partners and several City Council representatives have been meeting regularly to discuss policies and legislation that will improve housing stability for tenants by expanding access to safe, affordable, quality housing. Discussion has included consideration of an ordinance that would limit the criteria housing providers use to screen tenants, including restrictions on use of criminal history. The group advocates for legislation that would ensure housing providers' tenant selection policies comply with 2016 HUD guidelines regarding criminal history screening, including evaluation of the nature of offenses to determine whether they demonstrate a risk to the safety of the property or residents. These types of policies help to prevent unfair denial of housing to applicants who would otherwise qualify and increase the availability of housing for individuals returning from incarceration.
- TFHC conducted a virtual training focused on fair housing rights for reentry via Zoom and Facebook Live in April 2021, helping reentry advocates and service providers better understand how fair housing laws apply to individuals returning from incarceration.

Reporting period: July - September 2021 & October - December 2021

- The Building Bridges of Opportunity Community Experience virtual conference took place in October 2021, engaging statewide reentry advocates to learn about effective practices for successful reentry, connect to reentry resources, and collaborate with other reentry coalitions. TFHC participated in the conference by conducting a training session on how fair housing rights are applicable to reentry populations, including guidance on use of criminal history screening criteria by housing providers.
- TFHC regularly investigates allegations of housing discrimination based on criminal history.
- TFHC regularly conducts fair housing trainings for housing professionals, and these sessions include guidance for housing providers on how to conduct criminal history screenings in compliance with fair housing and HUD regulations.

Fair Housing Issue: Homeownership: Lending and Insurance
Goal: Encourage private lenders to provide credit opportunities in minority and low-income neighborhoods

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Develop and review plans for outreach	Provide support to TFHC		With available resources, will perform outreach	Second half of FY 2020
Develop and implement plans for enforcement	Provide support to TFHC		With available resources, enforce Fair Housing laws	Second half of FY 2020

Discussion:

Reporting period: July – September 2020 & October – December 2020

TFHC continues to work with KeyBank and Premier Bank (formerly First Federal Bank) to make lending accessible in underserved communities. TFHC met with KeyBank on 9/23/2020 and 2/1/2021. TFHC met with Premier Bank on 10/30/2020.

Reporting period: January – March 2021 & April – June 2021

TFHC met with Key Bank regarding the EQ2 investment on 3/2/2021, 3/10/2021 and 3/26/2021. TFHC held a quarterly meeting with Premier Bank on 3/26/2021.

Reporting period: July - September 2021 & October - December 2021

- TFHC met with KeyBank on 11/4/21.
- KeyBank, NeighborWorks Toledo Region, and The Fair Housing Center announced a partnership to make financing single-family homes easier and more affordable for low- to moderate-income individuals and families throughout the City of Toledo. The program, funded by a \$3 million investment from KeyBank and administered by NeighborWorks, will provide an estimated 60 first mortgage and refinance loans at below market rates to borrowers in primarily LMI neighborhoods with an annual income not exceeding 80 percent of the area median income. Designed to remove many of the obstacles people face when applying for a traditional loan, this new effort will help to improve access to homeownership by supporting first-time homebuyers in historically underserved neighborhoods.

Fair Housing Issue: Homeownership: Lending and Insurance

Goal: Address insurance discrimination issues

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Develop and review plans for outreach	Provide support to TFHC		With available resources, will perform outreach	Second half of FY 2020
Develop and implement plans for enforcement	Provide support to TFHC		With available resources, enforce Fair Housing laws	Second half of FY 2020

Discussion:

Reporting period: July – September 2020 & October – December 2020

- TFHC filed a case against the Ohio FAIR Plan demanding access to the Ohio Fair Plan's public records. The Ohio FAIR Plan's position is that it is not subject to public records requests. TFHC filed a mandamus action which is still pending in the Court of Appeals for the 10th Dist. of Ohio.
- TFHC also has at least one insurance discrimination case currently pending before the Ohio Civil Rights Commission.

Reporting period: January – March 2021 & April – June 2021

TFHC met with Key Bank regarding the EQ2 investment on 3/2/2021, 3/10/2021 and 3/26/2021. TFHC held a quarterly meeting with Premier Bank on 3/26/2021.

Reporting period: July - September 2021 & October - December 2021

- TFHC was recently successful in assisting a complainant in asserting a redlining claim against Allstate Insurance. The Ohio Civil Rights Commission found probable cause and the matter is now before an administrative law judge.
- TFHC was successful in a mandamus action filed against Ohio Fair Plan to force it to provide public records regarding access to insurance in Ohio. TFHC was successful before the magistrate in the 10th Dist. Court of Appeals. The case is currently pending with objections to the magistrate's decision filed by Ohio Fair Plan.

Fair Housing Issue: Homeownership: Lending and Insurance
Goal: Coordinate with local banks to create a loan product to address credit needs in minority neighborhoods

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Complete initial meeting	City staff should consult with TFHC to identify appropriate next steps for outreach and models from other cities		TFHC will attend meeting	Second half of FY 2020
Develop schedule for next steps in evaluation	Research models from other cities for coordination to encourage improved loan products		TFHC may assist with technical support as needed	Second half of FY 2020
Convene meetings with banks as appropriate	Discuss potential product collaborations with banks		TFHC can be available if needed	First half of 2021
Set time frame for roll out of new loan products	Consults with banks to determine this		TFHC reviews, discusses with city	First half of 2021

Discussion:

Reporting period: July – September 2020 & October – December 2020

- TFHC continues to work with KeyBank to create a much-needed community loan product.
- While TFHC continues its work as listed above, TFHC suggests that the City should convene a meeting of local banks to discuss improving the products that they make available to Toledoans, especially in majority-minority neighborhoods.
- At the same time, TFHC plans to analyze more closely local HMDA data that will become available later in 2021. TFHC is in discussions with other researchers to

help with analysis of this data. This information may be helpful to report publicly in order to encourage banks to improve lending services.

Reporting period: January – March 2021 & April – June 2021

TFHC met with Key Bank regarding the EQ2 investment on 3/2/2021, 3/10/2021 and 3/26/2021. TFHC held a quarterly meeting with Premier Bank on 3/26/2021.

Reporting period: July - September 2021 & October - December 2021

- TFHC met with KeyBank on 11/4/21.
- KeyBank, NeighborWorks Toledo Region, and The Fair Housing Center announced a partnership to make financing single-family homes easier and more affordable for low- to moderate-income individuals and families throughout the City of Toledo. The program, funded by a \$3 million investment from KeyBank and administered by NeighborWorks, will provide an estimated 60 first mortgage and refinance loans at below market rates to borrowers in primarily LMI neighborhoods with an annual income not exceeding 80 percent of the area median income. Designed to remove many of the obstacles people face when applying for a traditional loan, this new effort will help to improve access to homeownership by supporting first-time homebuyers in historically underserved neighborhoods.

Fair Housing Issue: Accessibility for persons with disabilities

Goal: Enforce current visitability and accessibility rules

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Collect information on current enforcement efforts	City staff may help provide information on current enforcement of accessibility rules		TFHC will help collect information	Second half of FY 2020
Develop and review plans for outreach	Provide support to TFHC		With available resources, will perform outreach	Second half of FY 2020
Develop and implement plans for enforcement	Provide support to TFHC		With available resources, enforce Fair Housing laws	Second half of FY 2020

Discussion:

Reporting period: July – September 2020 & October – December 2020

Update from TFHC:

- TFHC has a representative that serves on the Toledo Lucas County Commission on Disabilities and Community Advocates for Transportation Rights (CATR).

Update from The Ability Center:

- The Ability Center participated in the City of Toledo Consolidated Planning process and gave input on the basis of the needs of people with disabilities.
- The Ability Center monitored monthly reports regarding new housing developments.
- The Ability Center held regular meetings with the Department of Neighborhoods and Area Office on Aging to discuss housing issues.
- 8/25/2020: Housing Equity Roundtable
- 9/2/2020: Ohio Housing Policy Panel
- 9/29/2020: Housing Equity Policy Group

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- 10/15/2020: COT 10-year Housing Action Plan
 - 12/16/2020: DD Council Housing Policy Panel

Reporting period: January – March 2021 & April – June 2021

- A settlement was reached in a lawsuit filed by TFHC, The Ability Center, and resident Jenny Tillman against the builders and developers of Brooklynn Park senior housing community, alleging discrimination against persons with disabilities for failing to comply with federal regulations for housing accessibility. The agreement requires defendants to pay \$400,000 in damages and provide remediations to properties at no cost to residents. The case was covered by the local media and helped to raise awareness of the fair housing accessibility requirements that apply to design and construction.

Update from The Ability Center:

- 3/10/2021 Ohio Housing Policy Panel
- Tenant Protection Initiatives
- 4/7/2021: housing review for accessibility
- 4/2021: meeting with DON to discuss housing accessibility
- 4/2021: COT 10-year housing plan
- 5/2021: OSILC Housing Workgroup meeting
- 5/2021: housing accessibility review

Reporting period: July - September 2021 & October - December 2021

Update from TFHC:

- TFHC has a representative that serves on the Toledo Lucas County Commission on Disabilities and Community Advocates for Transportation Rights (CATR).

Fair Housing Issue: Accessibility for persons with disabilities

Goal: Encourage developers to increase accessibility

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Review current advocacy efforts	Consult with Ability Center	Ability Center	TFHC may engage in discussion as well	First half of FY 2020
Develop schedule for next steps in evaluation	Consult with Ability Center in this schedule	Ability Center		Second half of FY 2020
Draft legislation or other policy	Completed in consultation with Ability Center	Ability Center		Second half of FY 2020
Set timeframe for implementation of legislation or policy	Completed in consultation with Ability Center	Ability Center		First quarter of 2021

Discussion:

Reporting period: July – September 2020 & October – December 2020

Update from TFHC:

- TFHC has a representative that serves on the Toledo Lucas County Commission on Disabilities and Community Advocates for Transportation Rights (CATR).
- TFHC recently achieved a victory in the Federal Court for the Northern District of Ohio. On Summary Judgment, the Court found that the front entrances of a certain housing development must be made accessible even where the defendant alleged that another entrance, such as a garage, may be accessible. The authority extending from this case may be helpful for future enforcement efforts to assist persons with disabilities.

Update from The Ability Center:

- Ability Center convened the Universal Design Coalition, which put together a list of desired single-family housing accessibility features.
- The Universal Design Coalition made contact with an architect who will give a free consultation to single-family developers on how to adapt their plans in order

to offer an accessible/ visitable plan to potential customers.

- The Ability Center monitored reports from the City of Toledo and gave input into the plans of four different multi-family housing developments.
- 8/25/2020: Housing Equity Roundtable
- 9/2/2020: Ohio Housing Policy Panel
- 9/29/2020: Housing Equity Policy Group
- 10/15/2020: COT 10-year Housing Action Plan
- 12/16/2020: DD Council Housing Policy Panel

Reporting period: January – March 2021 & April – June 2021

- A settlement was reached in a lawsuit filed by TFHC, The Ability Center, and resident Jenny Tillman against the builders and developers of Brooklynn Park senior housing community, alleging discrimination against persons with disabilities for failing to comply with federal regulations for housing accessibility. The agreement requires defendants to pay \$400,000 in damages and provide remediations to properties at no cost to residents. The case was covered by the local media and helped to raise awareness of the fair housing accessibility requirements that apply to design and construction.
- Community partners and several City Council representatives have been meeting regularly to discuss policies and legislation that will improve housing stability for tenants by expanding access to safe, affordable, quality housing. Discussion has included consideration of an ordinance that would increase the required number of accessible units for any newly constructed federally subsidized housing developments.
- TFHC participates on The Ability Center's Universal Design Coalition.

Update from The Ability Center:

- 3/10/2021 Ohio Housing Policy Panel
- Tenant Protection Initiatives
- 4/7/2021: housing review for accessibility
- 4/2021: meeting with DON to discuss housing accessibility
- 4/2021: COT 10-year housing plan
- 5/2021: OSILC Housing Workgroup meeting
- 5/2021: housing accessibility review

Reporting period: July - September 2021 & October - December 2021

Update from TFHC:

- TFHC has a representative that serves on the Toledo Lucas County Commission on Disabilities and Community Advocates for Transportation Rights (CATR).
- TFHC participates on The Ability Center's Universal Design Coalition.

Fair Housing Issue: Source of income discrimination and voucher mobility

Goal: Enact local source of income discrimination protections

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Review status of local ordinance with Council	City to conduct this review		TFHC will attend initial meetings as needed	First half of FY 2020
Determine barriers to implementation of legislation	City to complete this review with Council	Possibly LMHA	TFHC can assist in discussions	Second half of FY 2020
Develop plan to address barriers if needed with clear timeframe for progress	City in consultation with others	LMHA	TFHC to assist	Second half of FY 2020
Complete vote to approve legislation	City Council			First quarter of 2021
Complete hearings and final council vote on the issue	City Council		TFHC to provide support	First quarter of 2022

Discussion:

Reporting period: July – September 2020 & October – December 2020

An ordinance prohibiting discrimination based on source of income—initially introduced to Toledo City Council in 2018 but not acted upon—was reintroduced in the fall of 2020. The legislation updates the City of Toledo's already existing anti-discrimination ordinance to include source of income as an additional protected class, effectively requiring housing providers to accept all legal, reliable sources of income including disability and military benefits, Social Security, and Housing Choice Vouchers (HCV). Public hearings were held by City Council, including a Neighborhoods Committee meeting and a Committee of the Whole meeting, which featured presentations from several community partners and allowed for public input. The legislation received support from organizations including TFHC, LMH, The Ability Center, ABLE, TLCHB, MHRBS, UPSE, and United Way of Greater Toledo. Many landlords and property owners expressed opposition to the ordinance, citing a reluctance to accept vouchers and participate in the HCV program. Legislation passed in December 2020 and goes into effect 120 days after passage. Partners including TFHC and LMH are developing an educational campaign to inform housing providers about the ordinance, in an effort to address FAQs, help housing providers become more familiar with the HCV program,

and encourage compliance. Plans include distributing informational documents and hosting an online training session.

Reporting period: January – March 2021 & April – June 2021

- TFHC and LMH collaborated to conduct a virtual informational session in March 2021 via Zoom and Facebook Live. Geared towards housing providers, the session provided an overview of the requirements of the SOI anti-discrimination ordinance and the housing choice voucher program, addressed common concerns, and answered questions from attendees. TFHC and LMH also developed educational materials for distribution to the community. In addition, TFHC incorporated information about SOI into its training curriculum that is utilized on an ongoing basis to educate housing providers and community members about fair housing rights and responsibilities.
- TFHC is accepting complaints and compiling relevant data related to instances of SOI discrimination.
- TFHC continues to advocate for the City to implement an administrative complaint process to ensure effective enforcement of SOI and other local civil rights protections. To assist in this effort, TFHC is conducting research to determine what methods other cities are employing to enforce local anti-discrimination ordinances.

Reporting period: July - September 2021 & October - December 2021

- TFHC regularly investigates allegations of discrimination based on source of income.
- TFHC assists housing providers in complying with SOI protections by conducting trainings, distributing educational materials, and providing guidance on policies and practices.
- TFHC continues to advocate for the City to implement an administrative complaint process to ensure effective enforcement of SOI and other local civil rights protections.

Fair Housing Issue: Source of income discrimination and voucher mobility

Goal: Increase voucher mobility

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
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Discuss voucher mobility improvements and what support the PHA may need	City to offer support and convene discussions as appropriate to review issues	LMH	TFHC will attend discussions	First half of FY 2020
Develop schedule for next steps in evaluation	In consultation with LMHA, determine if SAFMR is feasible or if other mobility improvements are possible	LMH	TFHC to provide technical support if needed	Second half of FY 2020
Implement strategies	Providing support as needed	LMH	TFHC to provide support if possible	Second half of 2021

Discussion:

Reporting period: July – September 2020 & October – December 2020

An ordinance prohibiting discrimination based on source of income—initially introduced to Toledo City Council in 2018 but not acted upon—was reintroduced in the fall of 2020. The legislation updates the City of Toledo's already existing anti-discrimination ordinance to include source of income as an additional protected class, effectively requiring housing providers to accept all legal, reliable sources of income including disability and military benefits, Social Security, and Housing Choice Vouchers (HCV). Public hearings were held by City Council, including a Neighborhoods Committee meeting and a Committee of the Whole meeting, which featured presentations from several community partners and allowed for public input. The legislation received support from organizations including TFHC, LMH, The Ability Center, ABLE, TLCHB, MHRBS, UPSE, and United Way of Greater Toledo. Many landlords and property owners expressed opposition to the ordinance, citing a reluctance to accept vouchers and participate in the HCV program. Legislation passed in December 2020 and goes into effect 120 days after passage. Partners including TFHC and LMH are developing an educational campaign to inform housing providers about the ordinance, in an effort to address FAQs, help housing providers become more familiar with the HCV program, and encourage compliance. Plans include distributing informational documents and hosting an online training session.

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ordinance and the housing choice voucher program, addressed common concerns, and answered questions from attendees. TFHC and LMH also developed educational materials for distribution to the community. In addition, TFHC incorporated information about SOI into its training curriculum that is utilized on an ongoing basis to educate housing providers and community members about fair housing rights and responsibilities.

- TFHC is accepting complaints and compiling relevant data related to instances of SOI discrimination.
- TFHC continues to advocate for the City to implement an administrative complaint process to ensure effective enforcement of SOI and other local civil rights protections. To assist in this effort, TFHC is conducting research to determine what methods other cities are employing to enforce local anti-discrimination ordinances.

Reporting period: July - September 2021 & October - December 2021

- TFHC regularly investigates allegations of discrimination based on source of income.
- TFHC assists housing providers in complying with SOI protections by conducting trainings, distributing educational materials, and providing guidance on policies and practices.
- TFHC continues to advocate for the City to implement an administrative complaint process to ensure effective enforcement of SOI and other local civil rights protections.

Goal: Enforce Fair Housing protections

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
TFHC to enforce Fair Housing Act	City to provide assistance and resources as appropriate to support enforcement work		TFHC will implement its enforcement work through direct client representation and in other matters	Ongoing

Discussion:

Reporting period: July – September 2020 & October – December 2020

TFHC Enforcement Summary:

- Total new cases: 26

By protected class:

- 17 Disability
- 4 National Origin
- 2 Race
- 3 Sex

By issue:

- 2 Harassment
- 21 Rental
- 2 Sales
- 1 Zoning

- Total number of persons impacted from successfully resolved cases: 44 persons
- 767 Referrals

Reporting period: January – March 2021 & April – June 2021

TFHC Enforcement Summary:

- Total new cases: 65

By protected class:

2 Color
37 Disability
3 Familial Status
2 National Origin
16 Race
1 Religion
4 Sex

By issue:

64 Rental
1 Sales

- Total number of persons impacted from successfully resolved cases: 17 persons
- 712 Referrals

Reporting period: July - September 2021 & October - December 2021

- Total new cases: 57

By protected class:

39 Disability
0 National Origin
13 Race
5 Sex

By issue:

0 Harassment
56 Rental
1 Sales
0 Zoning

- Total number of persons impacted from successfully resolved cases: 3,405 persons
- 1,141 Referrals

Fair Housing Issue: Increase awareness of fair housing rights and responsibilities

Goal: Engage in education and outreach activities

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Conduct fair housing trainings and presentations	Department of Neighborhoods will distribute information to CDBG partners as appropriate	Northwest Ohio REALTORS® (NOR), Property Investors Network (PIN), Real Estate Investors Association (REIA)	TFHC will coordinate and manage	Ongoing, reported quarterly
Distribute fair housing educational materials	Department of Neighborhoods will distribute information to CDBG partners as appropriate	Northwest Ohio REALTORS® (NOR), Property Investors Network (PIN), Real Estate Investors Association (REIA)	TFHC will coordinate and manage	Ongoing, reported quarterly
Place advertisements and seek media coverage of fair housing issues		Local media outlets, including print, television, radio, and digital	TFHC will coordinate and manage	Ongoing, reported quarterly
Participate in outreach events			TFHC will coordinate and manage	Ongoing, reported quarterly
Post fair housing information on website and social media	Mayor's office will share content as appropriate		TFHC will coordinate and manage	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

TFHC Education and Outreach Summary:

- Ongoing Advertising: Facebook, TFHC Website, Local publications, television, radio, & outreach activities
 - Impressions realized: 3,489,762
- Distribution of fair housing brochures and educational materials: 17,522
- Trainings conducted: 15
 - Persons trained: 208

Reporting period: January – March 2021 & April – June 2021

TFHC Education and Outreach Summary:

- Ongoing Advertising: Facebook, TFHC Website, Local publications, television, radio, & outreach activities
 - Impressions realized: 12,128,322
- Distribution of fair housing brochures and educational materials: 362
- Trainings conducted: 46
 - Persons trained: 3,250

Reporting period: July - September 2021 & October - December 2021

TFHC Education and Outreach Summary:

- Ongoing Advertising: Facebook, TFHC Website, Local publications, television, radio, & outreach activities
 - Impressions realized: 3,723,108
- Distribution of fair housing brochures and educational materials: 15,124
- Trainings conducted: 21
 - Persons trained: 383

Fair Housing Issue: Voucher Mobility

Goal: LMH should adopt the Poverty Race Research Action Council's recommendations to increase voucher mobility

Measurable objectives	City Department Responsible	Other Institutions	TFHC's role	Deadline
Landlord development	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMH, Northwest Ohio REALTORS® (NOR), Property Investors Network (PIN), Real Estate Investors Association (REIA)	Advocacy for policies that support the HCV program, provide education to housing providers	Ongoing, reported quarterly
Target population outreach	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMH	Advocacy for policies that support the HCV program, provide education to housing providers	Ongoing, reported quarterly
Pre-search counseling	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMH	Connect clients to resources through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Housing search assistance	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMH	Connect clients to resources through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Post-move support	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMH	Connect clients to resources through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Explore Small Area Fair Market Rents (SAFMRs)	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LMH	Advocacy for policies that support the HCV program	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

No updates this reporting period.

Reporting period: January – March 2021 & April – June 2021

LMH has been working with the local Continuum of Care regarding the Emergency Voucher Program to make vouchers available to homeless or those in threat of homelessness. This is a new HUD initiative that LMH is developing and will be implementing until the vouchers are distributed within the next 18 months.

Reporting period: July - September 2021 & October - December 2021

Update from LMH: Emergency Voucher Program is still moving forward, more updates expected next quarter.

Fair Housing Issue: Land Use and Zoning

Goal: Change policies to welcome the development of affordable, group, permanent supportive, and recovery housing

Measurable objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Review current policies and recommend changes	Plan Commission	MHR SB	Provide input on policy revisions	First half of FY 2020
Present proposed changes for approval	Plan Commission, City Council	MHR SB	Advocate for policy changes during public hearings	Second half of FY 2020
Consider neighborhood input on proposed projects that negatively impact historically disinvested areas	Plan Commission, City Council	MHR SB	Advocate for policy changes during public hearings	Ongoing, reported quarterly
Grant reasonable accommodations when applicable	Plan Commission, City Council	MHR SB	Advocacy and support for persons requesting accommodations	Ongoing, reported quarterly
Educate the public about the City's reasonable accommodation policy	Plan Commission, Department of Neighborhoods	Ability Center	Educate tenants and landlords	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

- Community partners including TFHC, ABLE, MHR SB, and The Ability Center have repeatedly submitted testimony and comments to the Plan Commission and City Council regarding the City's zoning regulations, expressing concerns that the regulations are overly restrictive as it pertains to housing for persons with disabilities. These organizations have also provided letters and comments of support for several specific supportive housing projects that have come before the Plan Commission and City Council for approval. These proposed projects have often faced NIMBYism from neighbors who express opposition on the basis of unfounded fears and stigmas about the residents.
- This group of community partners has also been conducting research and discussing amendments to the City of Toledo's zoning code to bring it more in alignment with fair housing and ADA guidelines. An ordinance has been drafted which removes outdated and offensive language, redefines group living categories, eliminates unnecessary permitting restrictions, and establishes an exception for Reasonable Accommodations. The ordinance will be proposed to City Council/Plan Commission for input and approval.

Reporting period: January – March 2021 & April – June 2021

- Community partners and the Plan Commission have held several meetings to discuss and make revisions to the group living ordinance described above. The legislation is currently under review by the City of Toledo law department.
- Community partners and several City Council representatives have been meeting regularly to discuss policies and legislation that will improve housing stability for tenants by expanding access to safe, affordable, quality housing. Discussion has included consideration of an ordinance that would increase the required number of accessible units for any newly constructed federally subsidized housing developments.

Reporting period: July - September 2021 & October - December 2021

In October 2021, Toledo City Council approved Warren Commons, a proposed 46-unit permanent supportive housing project to provide safe, stable housing options for individuals who are experiencing homelessness, returning from incarceration, in recovery, or diagnosed with mental health conditions. The project will support residents by connecting them to local services and resources including education, employment, and health care. The \$11 million development is a partnership of TASC of Northwest Ohio and Community Housing Network. The project received competitive low-income housing tax credits from the Ohio Housing Finance Agency to help fund its construction. Tenants will receive housing-choice vouchers through Lucas Metropolitan Housing to cover their rent. The proposal received support from many local organizations including TFHC, MHR SB, and TLCHB but many neighbors expressed opposition.

Fair Housing Issue: LGBTQIA+

Goal: Adopt changes to policies and practices to ensure adequate protections for LGBTQIA+ individuals

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Establish an effective enforcement process to address complaints	City Council	Equality Toledo	Provide input on policy changes	Second half of FY 2020
Present proposed changes for approval	City Council	Equality Toledo	Advocate for policy changes during public hearings	Second half of FY 2020
Utilize enforcement process to address complaints	City administration	Equality Toledo	Advocacy and support for victims of discrimination	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

No updates this reporting period.

Reporting period: January – March 2021 & April – June 2021

- In February 2021, HUD issued a memo stating that it will begin accepting complaints of housing discrimination based on sexual orientation and gender identity. Based on the Supreme Court decision *Bostock v Clayton County* and the corresponding Executive Order from President Biden, HUD concluded that the Fair Housing Act's recognition of sex as a protected class should be extended to include sexual orientation and gender identity, which means the Fair Housing Act can be enforced to prohibit sexual orientation and gender identity discrimination.
- TFHC continues to advocate for the City to implement an administrative complaint process to ensure effective enforcement local civil rights protections such as sexual orientation and gender identity.

- TFHC continues to advocate for the City to implement an administrative complaint process to ensure effective enforcement local civil rights protections such as sexual orientation and gender identity.

Fair Housing Issue: Homelessness and Affordable Housing

Goal: Coordinate with private and government partners to create affordable housing and advance No Barriers Housing

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Identify incentives to encourage affordable housing development	City administration, Department of Neighborhoods	LISC, LMHA	Advocacy for projects that support local housing needs	Ongoing, reported quarterly
Direct discretionary funds toward affordable housing	Department of Neighborhoods, City Council		Advocacy for projects that support local housing needs	Ongoing, reported quarterly
Provide administrative support for the "No Barriers Housing" initiative	Department of Neighborhoods, City administration	TLCHB, MHR SB, LMH, Lucas County Commissioners	Participate in committee meetings	Ongoing, reported quarterly
Provide financial support for the "No Barriers Housing" initiative	Department of Neighborhoods, City Council	TLCHB, MHR SB, LMH, Lucas County Commissioners	Advocacy for funding that supports local housing needs	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

No updates this reporting period.

Reporting period: January – March 2021 & April – June 2021

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- City of Toledo is supporting and funding a collaborative effort between Toledo Public Schools, Toledo Lucas County Homelessness Board, and Lutheran Social Services to provide rental assistance and supportive services for 12 months to 75 TPS families at risk or experiencing homelessness.
 - City of Toledo is supporting and partially funding the development and implementation of TLCHB's Housing Problem Solving Pilot Program, which is a person-centered approach that will enhance the Continuum of Care's prevention, diversion, and rapid resolution activities.
 - No Barriers Housing initiative is currently working with Continuum of Care providers to implement the HUD Housing First Standards Assessment Tool, which will allow for monitoring to ensure system-wide fidelity to housing first principles.
 - TLCHB has established a Landlord Risk Mitigation Fund to support the No Barriers Housing initiative through landlord engagement and incentives.

Reporting period: July - September 2021 & October - December 2021

No updates this reporting period.

Fair Housing Issue: Housing Conditions

Goal: Change policies and practices to ensure access to housing that is safe, healthy, and habitable

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Enforce housing code violations	Department of Neighborhoods	Housing Court	Connect clients to resources through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Secure staff and resources needed to implement the lead ordinance	City administration, Department of Neighborhoods	TLPPC, Health Department	Advocacy for effective implementation	First half of FY 2020
Effective enforcement of the lead ordinance	City administration, Department of Neighborhoods	TLPPC, Health Department	Education and outreach to tenants and housing providers	Ongoing, reported quarterly
Eliminate barriers to accessing grant funding for home rehab/repairs	Department of Neighborhoods		Advocacy for policy changes that improve access to housing assistance	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

Update from the Toledo Lead Poisoning Prevention Coalition (TLPPC): TLPPC has been holding regular meetings with the City's Lead Safe Coordinator to help ensure the successful enforcement and implementation of the Lead Ordinance. They are working on forming committees to focus on efforts including education and outreach and workforce development.

Update from Stephanie Beebe, who began position as Lead Safe Coordinator for the City of Toledo on Sept. 1, 2020:

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- Developed lead-safe marketing campaign with Will Lucas of Creadio to be implemented through 2021. Coordinated meetings between Will and multiple community stakeholders, including TLPPC. Implementation plan completed in Jan 2021, to be presented to TLPPC Feb 16, 2021.
 - Launched Toledo Lead Safe Website (www.ToledoLeadSafe.com) Oct 2020 for Lead Poisoning Prevention Week. Ongoing content development and added features throughout 2021.
 - Created processes with Health Department for lead-safe certification and local inspector registration. Paper applications for lead-safe certificates launched November 2020, with local inspector applications launching January 2021. As of now, fully online versions for these applications are in process with an expected launch of March 2021.
 - Coordinated back-end process of lead-safe certification tracking for eventual enforcement via Dept of Neighborhoods Code Enforcement in CityWorks management system. This was finalized and launched in January 2021, with grandfathered lead-safe certificates now being entered and processed.
 - Created and launched Workforce Development group in partnership Ohio Means Jobs, local inspectors, small business program administrators, and Toledo Rotary. Launched private training for inspectors in coordination with Lead Experts in February 2021. More trainers to follow in coming months as we also roll-out programs to help support inspectors and contractors doing lead work.
 - Established and launched Owner Advisory group to open communication between owners, the City, and the Coalition to discuss concerns, new programs, and work together for successful ordinance implementation.
 - Developed and submitted for multiple grant opportunities to support lead-safe programming in Toledo. Such as the Early Bird Match Grant from the Dept of Neighborhoods to be launched February 2021 to encourage property owners to comply with lead ordinance early by incentivizing repairs and compliance inspections. Also received grant from Greater Toledo Community Foundation in January 2021 to support my position as Lead Safe Coordinator in coordinating this work through multiple agencies and refining processes to work together for better service delivery.
 - Gearing up for first enforcement date of the Lucas County Auditor's Rental Registry on June 30th, 2021. We have piggybacked on the Auditor's statutory requirement to have rental properties in Toledo registered by making that one of our lead-safe certification requirements. Code Enforcement will be able to enforce this registration administratively, but the public registry is still pending launch on the Auditor's AREIS website.

Reporting period: January – March 2021 & April – June 2021

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- Update from Stephanie Beebe, Lead Safe Coordinator for the City of Toledo:
 - Ongoing implementation of lead-safe marketing campaign with Will Lucas of Creadio. Presented implementation plan to TLPPC in Feb. 2021, and have since rolled out OdEds in print and coordinated multiple radio/print/web interviews. Currently in process of finalizing 3-part video “docu-series” for TV release, radio PSAs for landlords and tenants, and a \$10,000 billboard campaign focused around lead-safety and lead-ordinance awareness.
 - Continued development and expansion of Toledo Lead Safe Website (www.ToledoLeadSafe.com). New features include: online lead-safe certificate applications, early bird match grant applications, FAQs and “one-stop shop” resources for rental owners, occupants, and inspectors.
 - Streamlined process with Health Department for lead-safe ordinance. Paper and online applications available. **All grandfathered certificates** mailed in June 2020, and new certificates being processed now.
 - Back-end process to track lead-safe certification complete in CityWorks management system. Continued working with Dept of Neighborhoods Code Enforcement for eventual enforcement of program after June 30, 2022 initial phase-in. Currently working to enforce the Rental Registry portion with the Lucas County Auditor’s collaboration (more below on that).
 - Workforce Development Committee continuing to meet monthly. New Lead Workforce Development Training Program being drafted to provide subsidized training and licensure to local lead inspectors, abatement contractors/workers, and RRP trainees. Also planning to launch both virtual and in-person information meetings for inspectors at large.
 - Owner Advisory group continuing to meet monthly. Currently planning to launch both virtual and in-person informational meetings for rental owners at large.
 - Received \$1 mil grant from HUD in April 2021 for “Healthy Homes and Weatherization Cooperation Demonstration” to provide comprehensive and coordinated service delivery between Dept of Neighborhoods’ Lead Hazard Control program and NeighborWorks Toledo’s Weatherization Assistance program. These funds will go to fill gaps that the two individual programs may be unable to address and also streamline coordination between the two entities.
 - Launched Early Bird Match Grant in February 2021 to provide rental owners assistance with compliance costs under the lead ordinance.
 - Coordinated partnership for BP Husky Settlement grant with Toledo-Lucas County Health Department. This will provide an additional \$1.2 mil of funding to be braided with the Dept of Neighborhoods’ current Lead Hazard Control

grant program.

- Launched rental registry education and enforcement with help of Lucas County Auditor on June 30th, 2021. Working with Code Enforcement and the Auditor to develop best practice enforcement tools on how to partner as registering rental properties in Toledo is Step #1 to becoming lead-safe and assuring we have accurate data of rentals in our community.
- TLPPC formed the Community Engagement/Education Subcommittee to increase awareness and knowledge among community members regarding lead poisoning beginning with primary prevention for lead safe environments for children. Members include representatives from healthcare systems, educational systems, pediatricians/healthcare providers, school nurses, housing, parents of lead-affected children, city/county government and legal representation. Activities completed and in progress during this reporting period:
 - Formation of subcommittee with 14 members
 - Regular email communications with subcommittee members assessing progress of work, questions, and concerns
 - Development of brochures and handouts for health professionals
 - Flyer created for parents/guardians by Lucas County Family Council including resources regarding screening young children and lead safe housing
 - Meetings scheduled with school nurse and advisory board of Escuela Smart TPS bilingual elementary school to initiate blood lead level screenings for children K to 8th grade and educational sessions for parents/guardians
 - Training meeting, 2 hours per Zoom, provided June 16, 2021 by Dr. Marilynne Wood for Health Connections Advisory Group
 - Discussions with ProMedica Health, Paramount and St. Vincent Mercy Health System regarding work of the TLPPC and coordination of community blood lead level screenings and lead poisoning prevention education for families
- The Lucas County Land Bank and the City hired a consultant to assess Toledo's code enforcement needs and recommend how the city can more effectively and equitably address nuisance properties and code violations. Findings were presented to City Council in March 2021. Recommendations included:
 - The City should move away from being reactive and relying on housing court to instead encourage voluntary compliance.
 - The City should form a neighborhood conditions working group so multiple interested parties can share information about problem properties, prioritize issues, and work together to bring a resolution.

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- The City should offer home repair grant and loan programs to offset the financial burden of compliance for property owners.

Reporting period: July - September 2021 & October - December 2021

Update from Stephanie Beebe, Lead Safe Coordinator for the City of Toledo:

- **LEAD COMMUNICATIONS PLAN DEVELOPMENT AND IMPLEMENTATION:** Continued development and implementation. Approved \$160,000 budget for 2022 ad spend and content creation. Billboard, radio, video, and social media campaigns being quoted and booked. Additional add of Children's Board Book distribution through childhood and healthcare partners. Completed filming of video docu-series and released parts 1, with parts 2 and 3 to release Q1 2022.
- **ONGOING WEBSITE UPDATES:** ToledoLeadSafe.com continues to be developed as new information rolls out. Recent additions include News page, Residents page, complete FAQ overhaul, and video trailer inclusion.
- **ONGOING ORDINANCE PROCESSING:** Working with code enforcement and health department to continue to process and streamline new applications, reminder letters, and fines/penalties as applicable to the lead-safe and rental registry ordinances. Approximately 23,000 letters being sent in Q1 2022 to rental owners to remind them of compliance requirements. To date, approximately 1,900 Lead-Safe Certifications and 19,000 Rental Registrations active in Toledo.
- **HIRING PERSONNEL:** Posted job opening for Lead Enforcement Specialist to work with Lead Safe Coordinator and Code Enforcement to handle program administration and fines/penalty processing.
- **WORKFORCE DEVELOPMENT:** Lead training program approved \$234,460 budget to train and license lead inspectors, lead abatement workers, and Renovation, Repair, and Painting (RRP) certified individuals to support lead work and ordinance. Over 300 students will be trained through this entire program. Schedule and details to be launched. Enrollment through community referral basis only. Attempting to develop additional building trades pipeline with Cherry St Mission, Goodwill, Northwest College, Owens, and others at monthly roundtable discussion.
- **GRANT/LOAN PROGRAMS IMPLEMENTATION:** HUD Lead Hazard Abatement and BP Husky grants continue to be administered through Department of Neighborhoods. Beginning application process for Toledo Healthy Homes and Weatherization Cooperation Demonstration (THHWCD) grant in partnership with NeighborWorks—finalized all healthcare partner trainings and opened to referrals. Concluded Toledo Community Foundation grant for lead-safe coordinator staffing role.
- **OUTREACH:** Ongoing outreach, communication, and partnership building with Toledo Lead Poisoning Prevention Coalition, Owner Advisory Group, Lucas Metropolitan Housing, Lucas County Land Bank, Mercy, ProMedica, other healthcare and pediatricians, TPS, early childhood education resources, Help Me

Grow, Ohio Department of Health, Governor's Lead Advisory Council, Ohio Healthy Homes Network, NeighborWorks, Historic South Initiative, Maumee Valley Habitat, etc.

Fair Housing Issue: Public Transportation

Goal: Lead efforts to adopt and expand county-wide transportation system

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Outreach to suburban jurisdictions to encourage participation	City Council, City administration	TARTA, Lucas County Commissioners, Chamber of Commerce, CATR, Ability Center	Advocacy for expansion of transportation	Ongoing, reported quarterly
Support sales tax ballot initiative to increase funding and expand TARTA services	City Council, City administration	TARTA, Lucas County Commissioners, Chamber of Commerce, CATR, Ability Center	Advocacy for expansion of transportation	Ongoing, reported quarterly
Offer alternative transportation options	City administration	TARTA, Lucas County Commissioners, Chamber of Commerce, CATR, Ability Center	Advocacy for expansion of transportation	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

CATR worked to create a group of interested Sylvania Township residents to encourage the trustees to support the sales tax initiative in Nov. 2020. Although Sylvania Township did pass the resolution, it was Maumee who voted it down in 2020, preventing it from going on the ballot in November. CATR has discussed and plans to reach out to legislators in Maumee to educate them and advocate for county wide public transit for the next or a future election.

Reporting period: January – March 2021 & April – June 2021

The Ohio transportation budget signed in March 2021 included a provision to reduce the requirement from unanimous to majority approval of current member jurisdictions to admit Lucas County as a new member. This advanced efforts to expand TARTA's service county-wide, as previous efforts failed due to the rejection of the measure by just one of the seven current member jurisdictions.

TARTA sought approval from its seven member jurisdictions and received approval from six (all except Maumee), meeting the majority requirement. TARTA's board then voted to officially admit Lucas County as a new member and place the sales tax measure on the November ballot.

The ballot measure will convert TARTA's funding source from property tax to sales tax and increase Lucas County sales tax by 0.5%. If approved by Lucas County voters, the measure would increase TARTA's revenue to enable the expansion of services to the entire county and ensure broader access to public transportation throughout the region.

Reporting period: July - September 2021 & October - December 2021

- In November 2021, voters approved a ballot measure to switch TARTA's funding source from property tax to sales tax and increase Lucas County sales tax, thereby generating additional revenue to support the expansion of TARTA's services.
- Launch of TARTA Next project, a comprehensive operations analysis that will take a broad and detailed look at TARTA's network, with the goal of improving existing system and services. Goals include: redesigning bus services to match the way people travel in the Toledo area, making it easier and faster for more people to get to work, and creating more opportunities to use TARTA for different kinds of trips.

Fair Housing Issue: Impediments in Rental Housing

Goal: Address the eviction crisis in Toledo

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Educate tenants and housing providers about rights and responsibilities	Department of Neighborhoods will distribute information to CDBG partners as appropriate	LAWO	Assist clients through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Provide emergency housing and financial assistance for those displaced due to eviction	City Council, Department of Neighborhoods	2-1-1, Pathway, Catholic Charities, Salvation Army, TLCHB, LMHA	Connect clients to community resources	Ongoing, reported quarterly
Increase legal representation for tenants in Housing Court		LAWO	Assist clients through the Landlord Tenant Mediation Program	Ongoing, reported quarterly
Stricter enforcement of housing code violations	Department of Neighborhoods	Housing Court	Assist clients through the Landlord Tenant Mediation Program	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

- As part of its new Landlord-Tenant Mediation program, TFHC conducted recurring Facebook live trainings to educate tenants and landlords on their rights and responsibilities.
- The City of Toledo and other agencies are currently providing emergency rental assistance and plan to continue these programs as funds are available. However, these programs must be improved and increased. Accessing the program can be difficult. Requirements for these programs that the City adds

locally and that HUD does not require must be removed. Wherever possible, the City should increase funds available.

- TFHC provided referrals and support to callers by connecting them to service providers offering rental assistance. When the federal government issued an eviction moratorium due to the COVID-19 pandemic, TFHC informed tenants about these protections and created a document to assist tenants in understanding and asserting their rights. TFHC also created and maintains a dedicated page on its website with information and links to housing-related resources during the pandemic.
- TFHC approached the Toledo Municipal Court to discuss increasing the filing fee to increase legal representation for tenants in Court and make other changes. These discussions are ongoing. The City of Toledo should support and advocate for increased representation in Court as well.
- TFHC has made a public records request to better understand the enforcement of the local housing code. Unfortunately, the City does not specifically track whether the person requesting code enforcement is a renter or a homeowner. We do know anecdotally, however, that renters often face significant challenges when attempting to complain about a housing code violation by their landlord. The City should track this data and work to be better responsive to tenant complaints about housing code violations.

Reporting period: January – March 2021 & April – June 2021

- The Fair Housing Center assisted the University of Toledo and ABLE in completing a study covering evictions and eviction trends in the Toledo, Ohio area. The study reviews more than 24,000 evictions in the Toledo area over a four-year period. It analyzes the harm of geographic location and impact of the evictions, as well as the relationship between race and other demographic information related to the evictions. The focus of the study was on the relationship of evictions and mental health disabilities and includes trends identified through interviews with mental health service providers serving persons with mental health disabilities. Now, this information can be used to guide policy advocacy including efforts to advance the goals of the Fair Housing Act as part of the City of Toledo's Analysis of Impediments to Fair Housing Choice. [Read more about the study.](#)
- Community partners and several City Council representatives have been meeting regularly to discuss policies and legislation that will improve housing stability for tenants by expanding access to safe, affordable, quality housing. An ordinance has been drafted and discussed to implement Right to Counsel, ensuring income-qualifying tenants have access to legal representation in Housing Court. A budget has also been developed by LAWO to determine the funding needed for attorneys and other resources to support the program. Right to Counsel has proven successful in other cities to help tenants better understand and assert their rights, thereby preventing unnecessary evictions. It's expected to be introduced to City Council in August.

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- The recipient of federal COVID relief funding, the City of Toledo and Lucas County collaborated to launch a second round of emergency rental assistance, allocating \$11,507,996 for direct rental assistance to benefit income-eligible tenants in Toledo and Lucas County. The new program will assist low- to moderate-income households in the city and county with up to 12 months emergency rental assistance, which may include payment for current and future rent, past due rent, late fees, new renter fees, security deposits, and utility deposits and payments. Attempts were made to correct some of the barriers identified in previous rental assistance programs by removing unnecessary requirements, establishing a centralized intake process, and offering applications online. Financial assistance is a critical tool to help preserve housing stability for tenants and avoid eviction, displacement, and homelessness.

Reporting period: July - September 2021 & October - December 2021

- In September 2021, Toledo City Council approved a Right to Counsel ordinance, ensuring low-income tenants will have legal representation in eviction court. Services will be provided by LAWO.
- TFHC continues to operate its Pre-Litigation Landlord Tenant Mediation Program for residents of Lucas County, offering free, confidential mediation services to resolve rental disputes and prevent evictions.
- In December 2021, the City of Toledo and Lucas County announced the relaunch of its rental assistance program. An additional \$10 million is being made available to assist low to moderate-income households in the city and county with up to 18 months of rent, utility, and internet support. That may include payment for current and future rent, past due rent, late fees, new renter fees, security deposits, and utility deposits and payments.

Fair Housing Issue: Impediments in Rental Housing

Goal: Ensure access to reasonable accommodations and modifications to improve housing accessibility

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Educate tenants and housing providers about rights and responsibilities	Department of Neighborhoods will distribute information to CDBG partners as appropriate	Ability Center	Conduct trainings, distribute educational materials, place advertisements	Ongoing, reported quarterly
Enforce Fair Housing Act violations		Ability Center	Assist victims, conduct investigations, file complaints	Ongoing, reported quarterly
Provide funding for accessibility modifications	Department of Neighborhoods	Ability Center	Advocacy for funding that supports housing needs	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

Update from TFHC:

- Number of RA/RMs granted for persons with disabilities: 3 cases (5 persons)
- 17 out of 26 new cases (65%) were based on disability discrimination
- TFHC regularly conducts fair housing trainings for community groups and housing professionals, distributes educational materials, places advertisements in various media outlets, posts information on its website and social media, distributes quarterly newsletters, and has staff representatives serving on various community committees, boards, and coalitions. These activities help to raise awareness about housing rights for persons with disabilities.

Update from The Ability Center:

- The Ability Center operates a Home Accessibility Program where it provides ramps at no-cost to homeowners with disabilities.
- The Ability Center fielded 215 calls from individuals with disabilities who had housing issues.
- 8/25/2020: Housing Equity Roundtable
- 9/2/2020: Ohio Housing Policy Panel
- 9/29/2020: Housing Equity Policy Group
- 10/15/2020: COT 10-year Housing Action Plan
- 12/16/2020: DD Council Housing Policy Panel
- Ramps built:
 - 24 - grants & waiver
 - 8 – temp ramp program
 - 1 – hospice

Reporting period: January – March 2021 & April – June 2021

Update from TFHC:

- Number of RA/RMs granted for persons with disabilities: 7 cases (11 persons)
- 37 out of 65 new cases (57%) were based on disability discrimination
- TFHC regularly conducts fair housing trainings for community groups and housing professionals, distributes educational materials, places advertisements in various media outlets, posts information on its website and social media, distributes quarterly newsletters, and has staff representatives serving on various community committees, boards, and coalitions. These activities help to raise awareness about housing rights for persons with disabilities.

Update from The Ability Center:

- 3/10/2021 Ohio Housing Policy Panel
- Tenant Protection Initiatives
- 4/7/2021: housing review for accessibility
- 4/2021: meeting with DON to discuss housing accessibility
- 4/2021: COT 10-year housing plan

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- 5/2021: OSILC Housing Workgroup meeting
 - 5/2021: housing accessibility review
 - Ramps built:
 - 15 – grants & waiver
 - 9 – temp ramp program
 - 2 – hospice

Reporting period: July - September 2021 & October - December 2021

Update from TFHC:

- Number of RA/RMs granted for persons with disabilities: 24 cases (3,219 persons)
- 39 out of 57 new cases (68%) were based on disability discrimination
- TFHC regularly conducts fair housing trainings for community groups and housing professionals, distributes educational materials, places advertisements in various media outlets, posts information on its website and social media, distributes quarterly newsletters, and has staff representatives serving on various community committees, boards, and coalitions. These activities help to raise awareness about housing rights for persons with disabilities.
- TFHC conducted several trainings with a specific emphasis on reasonable accommodations and modifications to ensure accessibility for persons with disabilities. These sessions included a presentation to homeless service providers hosted by TLCHB and TAAEH, trainings for two local public housing authorities, a virtual training on Zoom/Facebook Live covering housing rights for people with disabilities, and a CLE training for attorneys conducted in collaboration with the Toledo Bar Association.

Update from The Ability Center:

- Ramps built:
 - 15 – grants and waiver
 - 6 – temp ramp program to help D/C safely
 - 2 – hospice installs

Fair Housing Issue: Access to Water Services

Goal: Adopt policy and practice improvements through Water Affordability and Consumer Protection Committee

Measurable Objective	City Department Responsible	Other Institutions	TFHC's role	Deadline
Review and revise consumer policies and programs as needed	Department of Public Utilities, City administration, City Council	UPSE, Junction Coalition, Freshwater Future, Ohio Environmental Council	Participate in committee meetings and offer input	Ongoing, reported quarterly
Collect and analyze data related to water access and affordability	Department of Public Utilities, City administration, City Council	UPSE, Junction Coalition, Freshwater Future, Ohio Environmental Council	Participate in committee meetings and offer input	Ongoing, reported quarterly
Educate consumers about assistance programs	Department of Public Utilities, City administration, City Council	UPSE, Junction Coalition, Freshwater Future, Ohio Environmental Council	Connect clients to community resources	Ongoing, reported quarterly
Outreach to residents and neighborhood groups to seek input on water access and affordability	Department of Public Utilities, City administration, City Council	UPSE, Junction Coalition, Freshwater Future, Ohio Environmental Council	Advocacy for policies that support housing needs	Ongoing, reported quarterly

Discussion:

Reporting period: July – September 2020 & October – December 2020

- The Water Affordability and Consumer Protection Committee has been meeting monthly to discuss policies and legislation to improve water access and affordability for all residents. Representatives from City Council, DPU, TFHC, Ohio Environmental Council, Freshwater Future, Junction Coalition, UPSE, and neighborhood residents attend meetings. Data has been requested and provided by DPU to help members analyze water issues and identify who is being impacted. Committee members communicated the need for a water affordability study to better understand the scope of the community's needs and make appropriate recommendations for changes to the City's water policies. An RFP was developed and posted, and a contractor was selected to begin work. The committee also drafted an ordinance to establish a debt forgiveness program that would enable residents to eliminate past due balances and avoid water shutoffs. The ordinance is currently under review by the City's law dept.
- City Council passed an ordinance in June 2020 to help protect tenants from water shut offs that occur when owners do not pay the water bill or request termination of water services. The new ordinance, drafted by TFHC, enables tenants to pay the water bill to avoid disconnection and gives them the right to deduct these costs from future rent payments. Further, it prohibits the Department of Public Utilities from terminating water service to occupied rental properties, which prevents owners from shutting off utilities as a form of "self-help eviction" to force tenants to leave. Water is essential for a home to be safe, healthy, and habitable, and this legislation will ensure tenants are not denied the right to this vital resource.

Reporting period: January – March 2021 & April – June 2021

- In May 2021, City Council approved the debt forgiveness program developed in partnership with the Water Affordability and Consumer Protection Committee. Residents that are low-income, elderly, or have disabilities may enroll beginning in August. By paying their current water bill monthly for a period of one to two years (depending on the amount of debt on the account), residents will receive credit that will eventually erase all past accumulated arrears. The goal of the program is to prevent water shutoffs by offering manageable monthly payments and forgiving debts that consumers do not have the ability to pay.
- TFHC drafted a water reselling ordinance that was introduced to City Council in July 2021. The legislation aims to clarify the City's current prohibition against reselling water, in order to prevent the abusive and confusing practices that often arise when landlords pass the cost of water onto tenants.

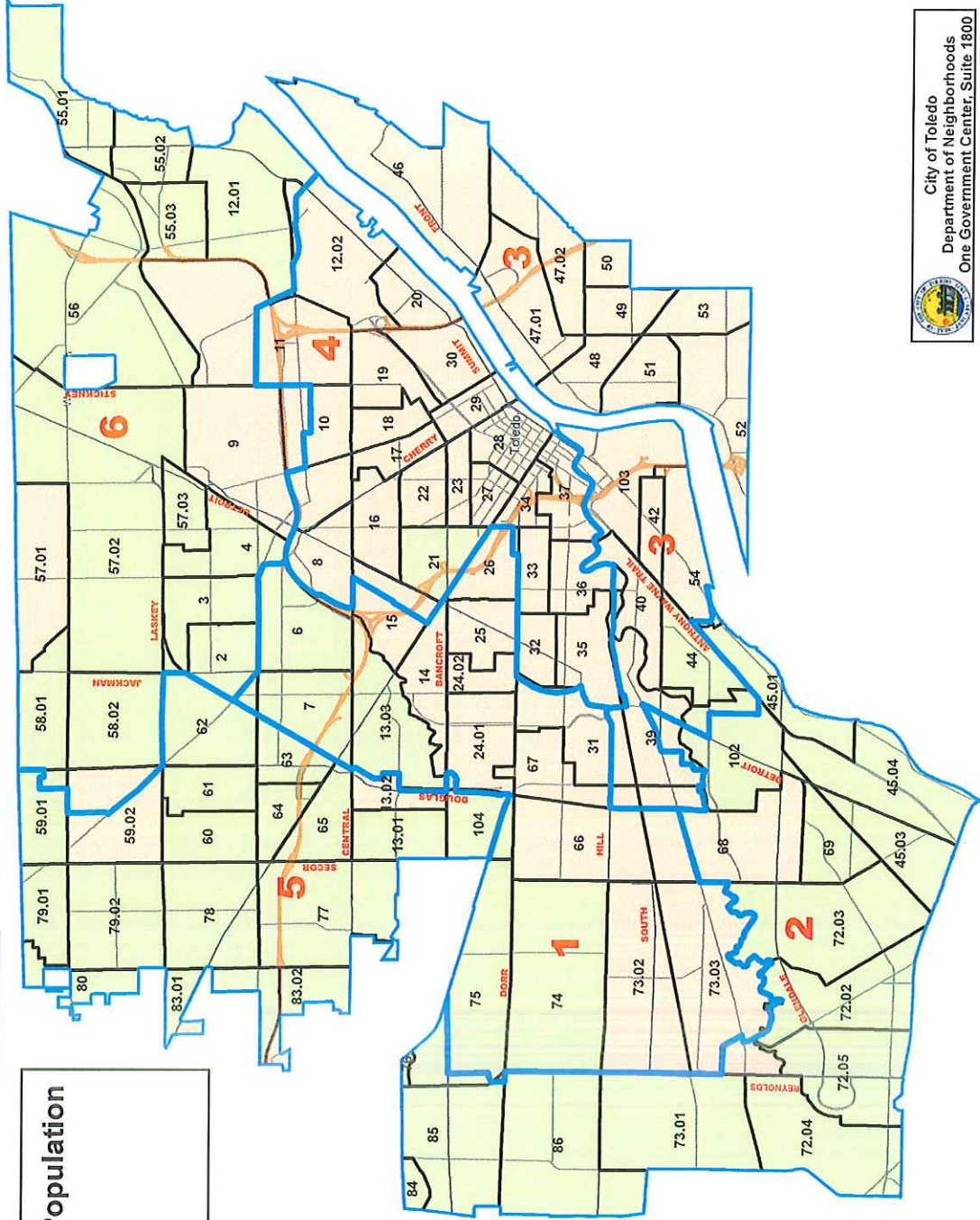
- Because Ohio law requires that water service be set up in the landlord's name, complications arise when tenants are asked to pay for water but do not have access to the account. In an effort to combat the confusing and abusive practices that often arise when water costs are passed onto tenants, TFHC educated the community and City Councilpersons on the need for revisions to Toledo's local rules on water reselling. Approved by City Council in August 2021, the legislation restricts landlords from charging tenants separately for water unless they meet specific conditions. For rental properties with more than one unit, owners may not charge tenants separately for water unless they obtain permission through a contract with the Department of Public Utilities and meet sub-metering requirements for each unit. For single-family rental properties, owners may not charge tenants separately for water unless they set up a landlord-tenant agreement with the Department of Public Utilities, giving the tenant direct access to the water account.
- TFHC created and distributed an educational document outlining Toledo's local regulations related to water access for rental properties.
- Ohio Environmental Council hosted its annual law conference in November 2021, featuring an extensive discussion about efforts Toledo has made to address environmental justice issues and provide better access to clean water. The conference included a presentation from TFHC's VP and General Counsel George Thomas on the disparate impact of water shut-offs on low-income neighborhoods and communities of color.

MAPS

City of Toledo 2021 Low - and - Moderate Income (LMI) Census Tracts

Low - and - Moderate Income by Population

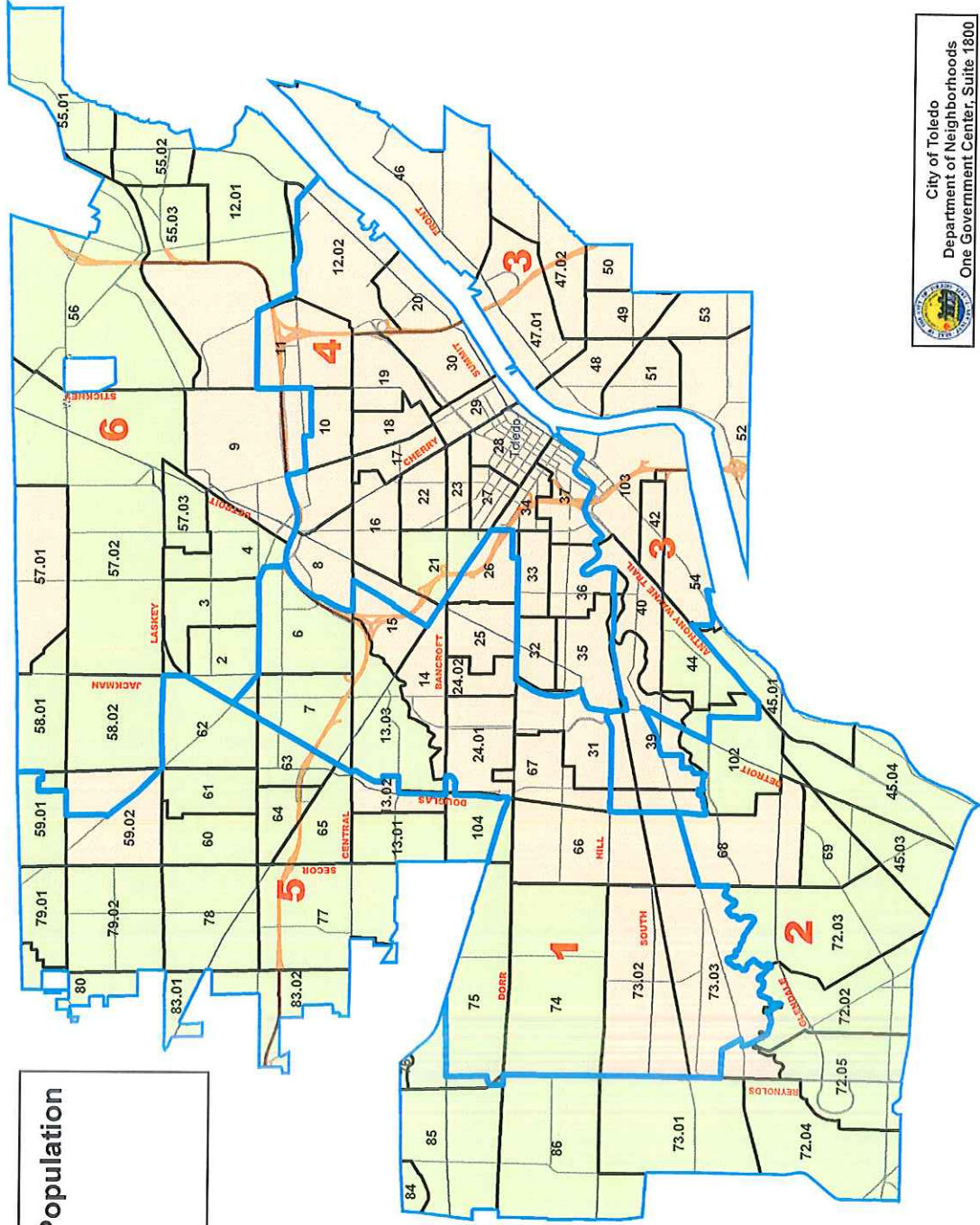
- Council Districts (1-6)
- <51% LMI Population
- >51% LMI Population



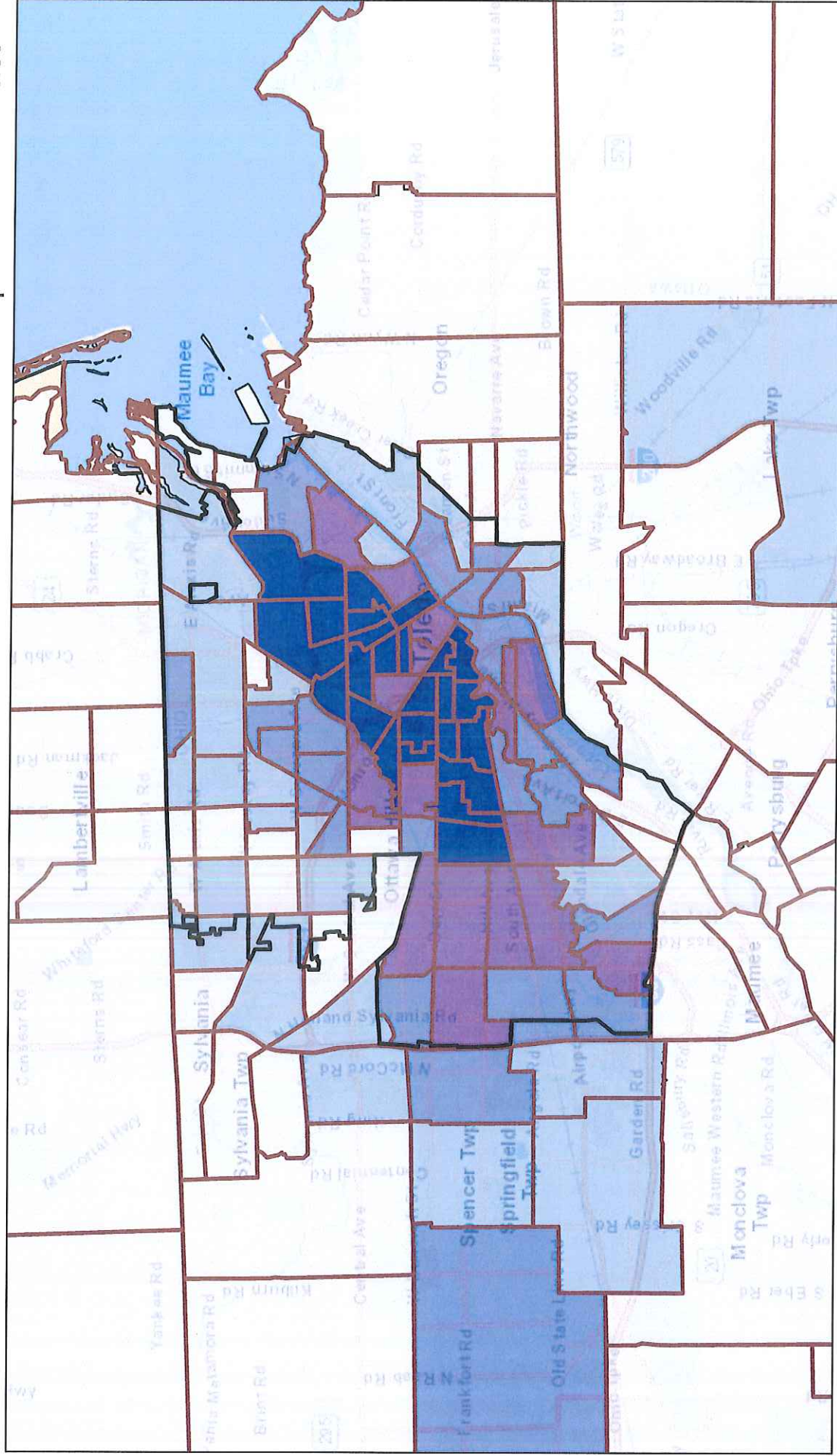
City of Toledo 2021 Low - and - Moderate Income (LMI) Census Tracts

Low - and - Moderate Income by Population

- Council Districts (1-6)
- <51% LMI Population
- >51% LMI Population



Black or African American Population in Toledo - Concentration of Minorities per Census Tract



April 1, 2022

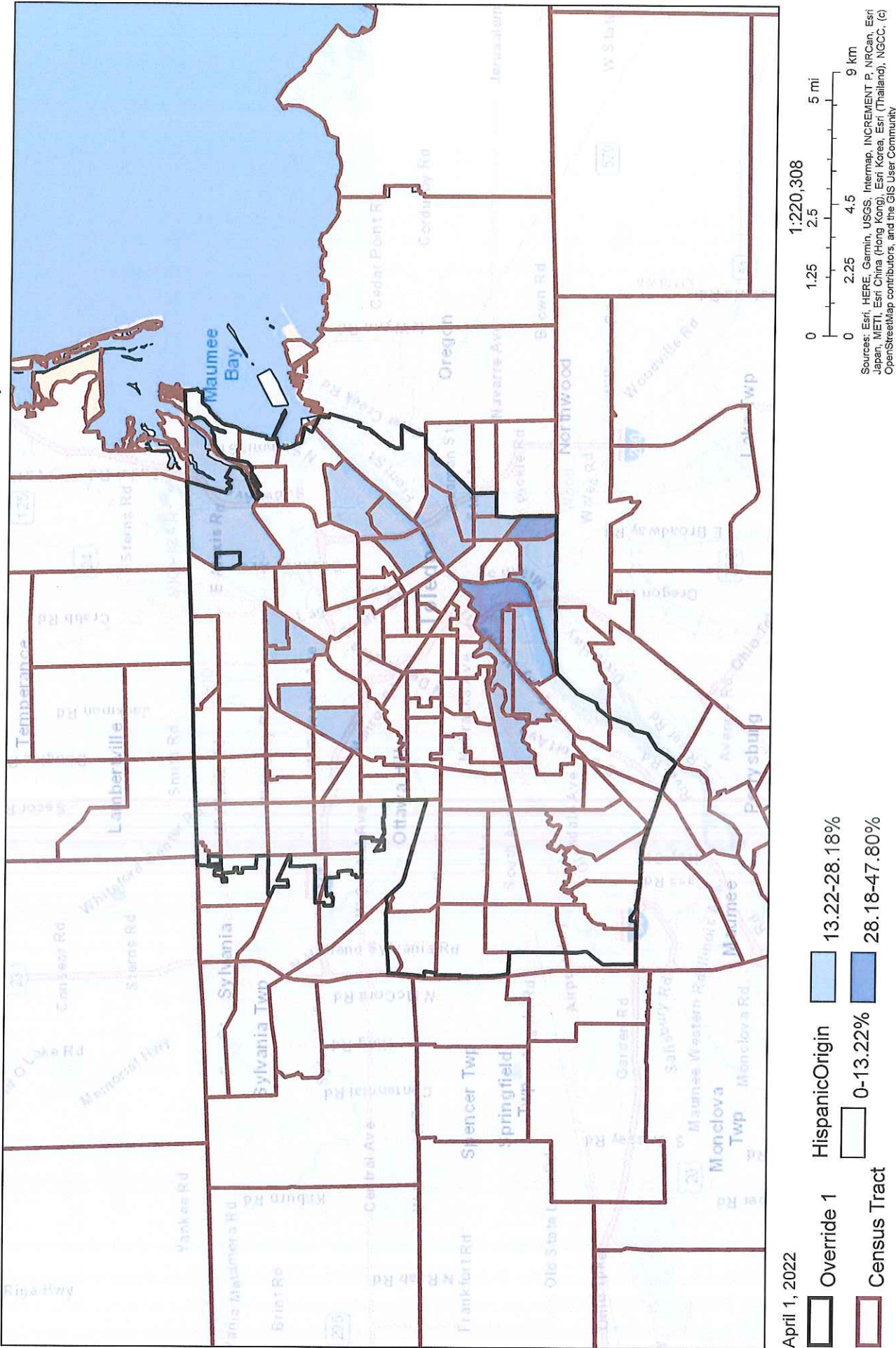
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0 1.25 2.5 4.5 5 mi

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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

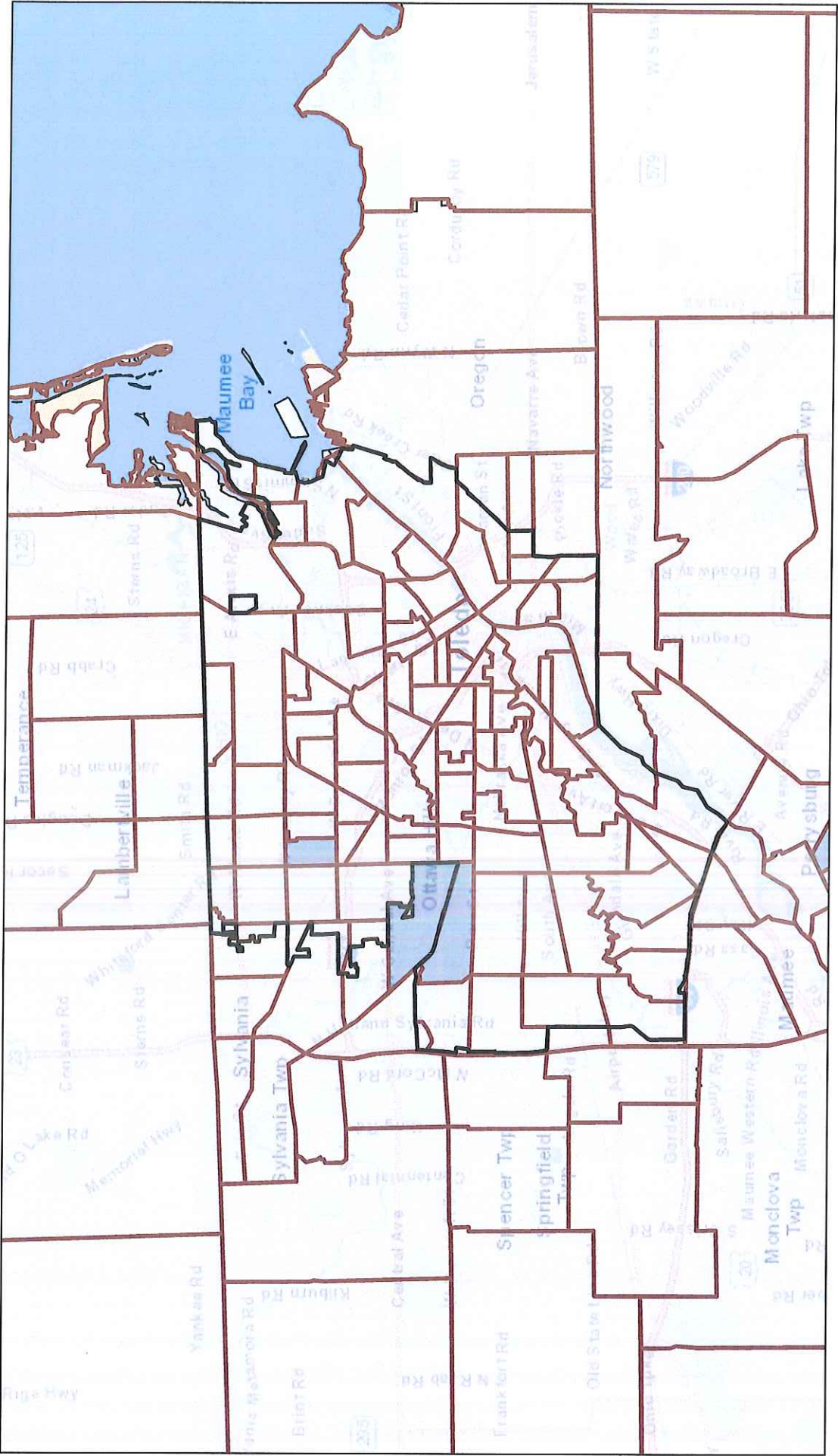
Hispanic Population in Toledo - Concentration of Minorities per Census Tract



Native Hawaiian/Pacific Islander Population in Toledo - Concentration of Minorities per Census Tract



Asian Population in Toledo - Concentration of Minorities per Census Tract



April 1, 2022

- Override 1
- Asian Alone
- Census Tract

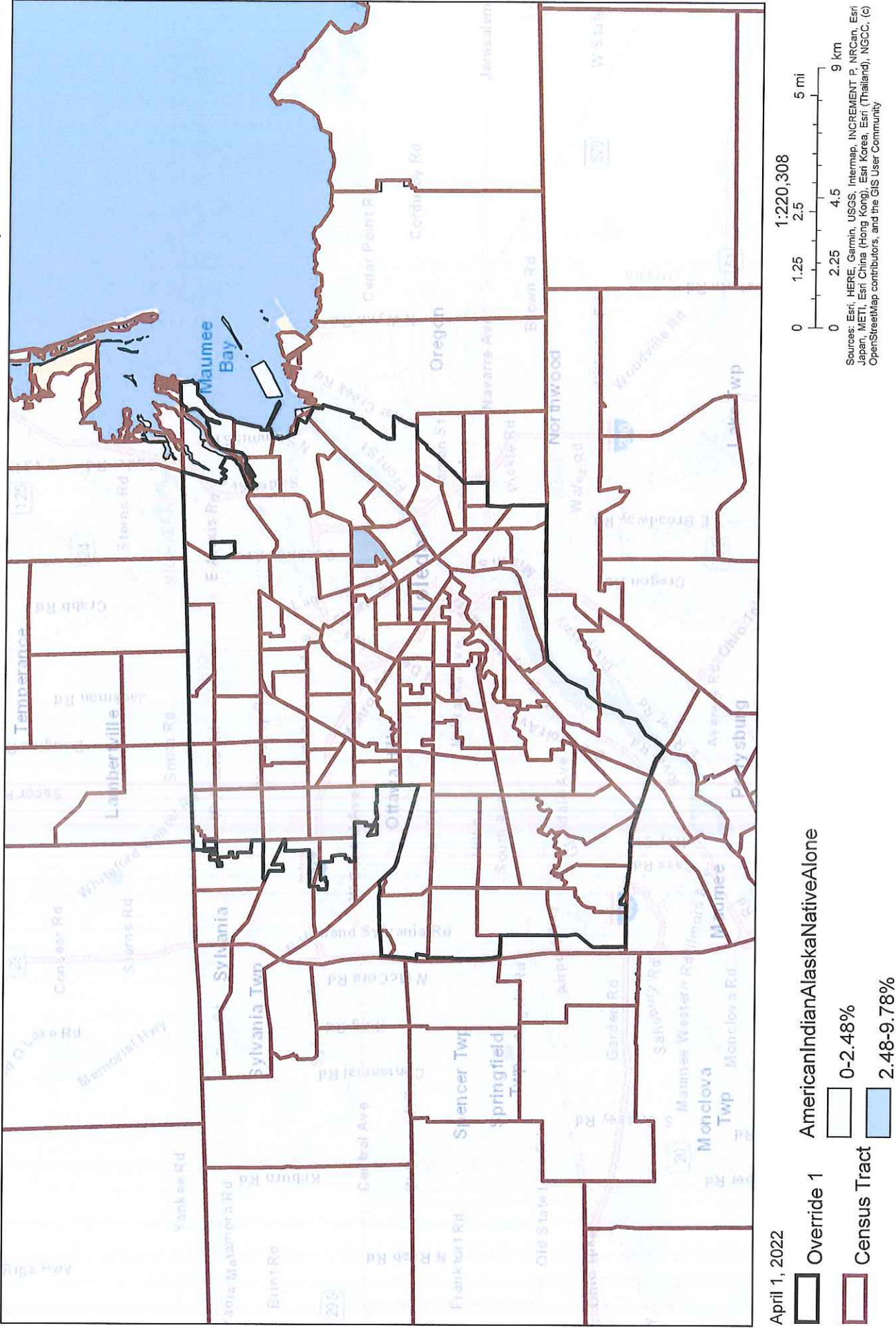
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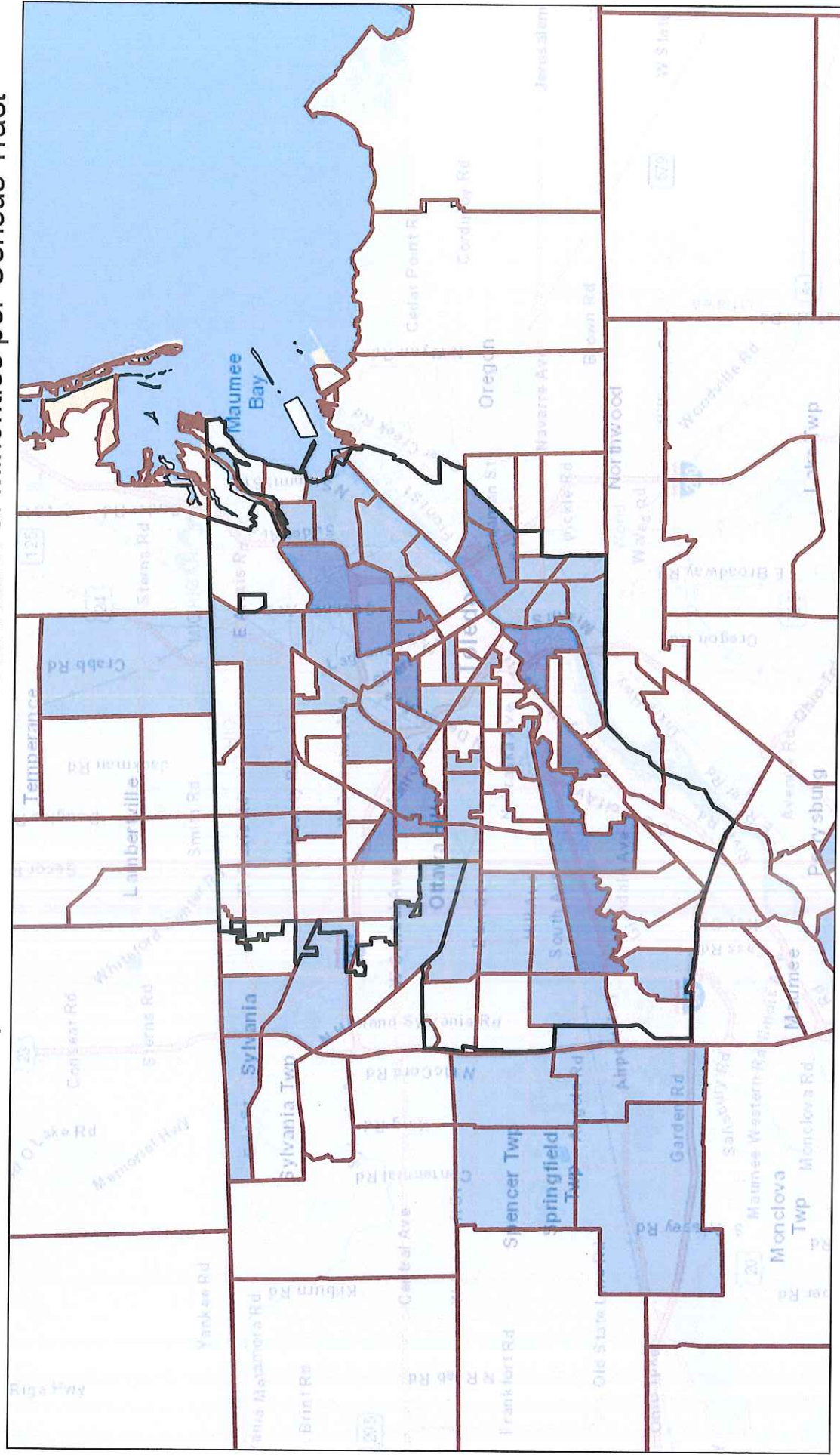
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Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

American Indian/Alaska Native Population in Toledo - Concentration of Minorities per Census Tract



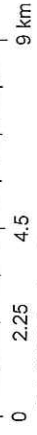
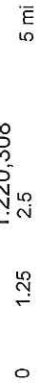
Two or More Races Population in Toledo - Concentration of Minorities per Census Tract



April 1, 2022

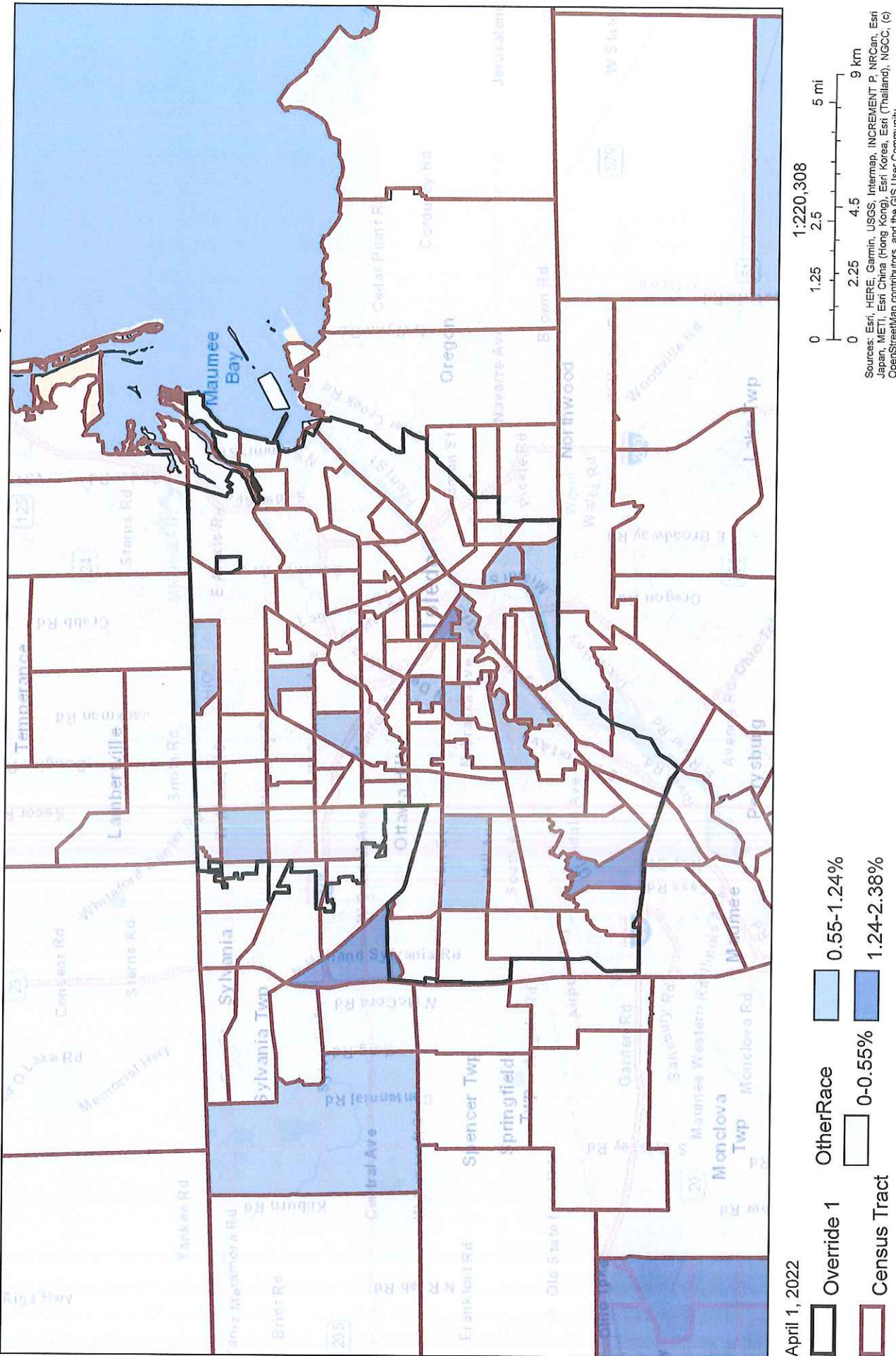


1:220,308



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Some Other Race Population in Toledo - Concentration of Minorities per Census Tract



**EMERGENCY
SOLUTIONS
GRANTS AND
HOMELESSNESS**

OH-501 TOLEDO/LUCAS COUNTY CONTINUUM OF CARE WRITTEN STANDARDS

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INTRODUCTION

The OH-501 Toledo/Lucas County Continuum of Care (CoC) is responsible for coordinating and implementing a system to meet the needs of the population and subpopulations experiencing homelessness within the geographic area of the CoC, which covers all of Lucas County, Ohio. Both the Emergency Solutions Grant (ESG) Rule and the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Continuum of Care Program Interim Rule state that the CoC must establish and consistently follow written standards for providing Continuum of Care assistance.

They will be reviewed annually, and any substantial changes will be approved by the TLCHB Board of Directors.

The written standards have been established to ensure that persons experiencing homelessness who enter projects throughout the OH-501 Toledo/Lucas County CoC jurisdiction will be given similar information and support to access and maintain permanent housing. All projects that receive City of Toledo ESG and OH-501 Toledo/Lucas County CoC funding are required to abide by these written standards where applicable. The CoC strongly encourages projects that do not receive either of these sources of funds to accept and utilize these written standards.

It should be noted that the U.S. Department of Housing and Urban Development (HUD) regulations for each of the referenced programs shall always take precedence over any of the standards outlined in this document (<https://www.hudexchange.info>). The CoC Program Notice of Funding Availability (NOFA) may authorize additional eligibility requirements. Projects funded under the CoC program must follow both CoC Program NOFA and other HUD-issued guidance and requirements. In addition, local ESG Programs may impose additional requirements to their funding recipients that do not apply to other CoC recipients.

In the event of a declared state of emergency, natural disaster, public health crisis, or other extenuating circumstances, the OH-501 Toledo/Lucas County CoC may issue emergency protocols which would be in effect for the duration of and in response to those circumstances. Such guidance will be issued in a separate addendum to the Written Standards.

GENERAL STANDARDS

The following standards apply to all projects funded through the CoC or with City of Toledo ESG and CDBG funds.

HMIS Participation

All organizations receiving ESG, CDBG or CoC funds must participate fully in the CoC's Homeless Management Information System (HMIS) to enter data on persons served and assistance provided. Victim service providers receiving ESG or CoC funds are required by 24 CFR 576.400(f) and 580.32(d) to use a comparable database that meets all HUD standards for HMIS and provides for security, data quality, and privacy.

Coordinated Entry Process (a/k/a Coordinated Assessment System)

All projects located within the OH-501 Toledo/Lucas County CoC that receive CoC and Emergency Solutions Grants (ESG) funding are required to participate in the coordinated assessment system and are therefore subject to complying with the Coordinated Entry Written Standards, Policies and Procedures as outlined and developed by the OH-501 Toledo/Lucas County. This system will include all homeless subpopulations and involve the use of a standardized assessment tool designated by the Coordinated Entry Written Standards. This system will establish a uniform decision-making process to prioritize households seeking assistance and provide referrals to those households. The coordinated entry system (CES) will ensure that those with the greatest needs receive priority for housing and service provision and that no unnecessary barriers exist for individuals to receive assistance. The Coordinated Entry Written Standards, Policies, and Procedures can be found at [The Coordinated Entry Written Standards, Policies and Procedures can be found at: https://endinghomelessness Toledo.org/coordinated-assessment](https://endinghomelessness Toledo.org/coordinated-assessment).

The terms "Coordinated Entry Process" and "Centralized or Coordinated Assessment System" are used interchangeably throughout federal guidelines. The CoC Program interim rule at 24 CFR 578.3 defines centralized or coordinated assessment as the following:

"...a centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. A centralized or coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool..."

For the purpose of this document, the term "Coordinated Entry" or "Coordinated Entry Process" are used to reference "Centralized or Coordinated Assessment System" and "Coordinated Entry Process."

Removal of Barriers

All projects that have committed to a Housing First approach must ensure that their projects do not screen any individuals or families out for assistance based upon perceived barriers to housing or services. However, all OH-501 Toledo/Lucas County providers are encouraged to review their policies and remove barriers wherever possible. Examples of this include, but are not limited to, the following:

- Having too little or no income
- Current or past substance abuse
- Having a criminal record (w/exception of state mandated restrictions)
- Having a history of domestic violence

In addition, assistance may not be terminated to any recipients based upon these barriers. Examples of this include:

- Failure to participate in supportive services and case management activities
- Failure to make progress on a services plan
- Loss of income or failure to improve income
- Being a victim of domestic violence

Termination of Assistance

ESG or CoC-funded homeless assistance providers may terminate assistance to a program participant who violates program requirements or conditions of occupancy. Termination under this section does not bar the provider from providing further assistance at a later date to the same individual or family.

In terminating assistance to a program participant, the provider must have in place a formal process that recognizes the rights of individuals receiving assistance under the due process of law. This process, at a minimum, must consist of:

- Providing the program participant with a written copy of the program rules and the termination process before the participant begins to receive assistance.
- Written notice to the program participant containing a clear statement of the reason(s) for termination.
- The option for a review of the decision, in which the participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision.
- Prompt written notice of the final decision to the program participant.

Providers of permanent supportive housing for hard-to-house populations of homeless persons must exercise judgement and examine all extenuating circumstances in determining when violations are serious enough to warrant termination so that the participant's assistance is terminated only in the most severe cases. All CoC, ESG and CDBG must have a grievance policy.

Grievance Process

Policy

The Toledo Lucas County Homelessness Board is committed to ensure that clients receiving services are aware of the rights afforded to them. TLCHB staff will prepare an annual summary of all grievances and resolutions and provide an annual report to the board of directors.

Procedure: Grievance Assignment

TLCHB's Executive Director will assign a team member from Toledo Lucas County Homelessness Board. Once someone has been assigned, the agency will be contacted notifying them via email, who has been assigned to review the grievance.

Procedure: Client Grievances

1. The Toledo Lucas County Homelessness Board will accept and review all complaints/grievances.
2. TLCHB will notify the agency of the grievance and gain any additional details necessary to make a further determination.
3. TLCHB will then determine if further grievance follow-up will require an on-site visit with the agency and client.
4. Once a determination has been made the agency and client will be notified of the date and time that the visit will occur, and who is assigned to the grievance from TLCHB.
5. At the grievance meeting, both the client and the agency staff will have the opportunity to present all their concerns.
6. Once this meeting is concluded, within 7-10 business a report will be issued determining the outcome of the grievance.
7. The agency's Board President, Executive Director and client(s) will receive a copy of the final report

Procedure: Client Guidelines and Grievance Policy

1. TLCHB will annually review each agency's Client Guidelines and Grievance Policy.
2. TLCHB will provide an annual and semi-annual report of all grievances and outcomes to the Executive Director and Board President of each agency.
3. This information will also be made available for agency funders.

Faith-Based Activities

The minimum standards required for faith-based providers are as follows:

- Providers receiving funding through ESG, CDBG or CoC programs may not engage in inherently religious activities as part of those funded activities. Those religious activities must be offered separately from the ESG, CDBG or CoC-funded projects and all participation must be voluntary.
- All religious organizations receiving ESG, CDBG or CoC funding shall retain their independence from government and may continue with their missions provided that ESG, CDBG or CoC funds are not used to support inherently religious activities. They shall also maintain authority over their internal governance.
- No organization receiving ESG, CDBG or CoC funds may discriminate against a participant based on religion or religious beliefs.

- ESG, CDBG and CoC funds may be used for the rehabilitation of structures that are used for eligible activities under the programs but may not be used to rehabilitate structures used specifically for religious activities.

Fair Housing and Equal Opportunity

It is the policy of the OH-501 Toledo/Lucas County CoC to comply fully with all federal, state, and local nondiscrimination laws and to operate in accordance with the rules and regulations governing Fair Housing and Equal Opportunity in housing and employment. The OH-501 Toledo/Lucas County CoC, including its recipients and subrecipients, shall not on account of race, color, sex, religion, national origin, family status, disability or age deny any family or individual the opportunity to apply for or receive assistance under HUD's Programs. All recipients and sub-recipients of ESG, CDBG and CoC funding must comply with the requirements for equal opportunity, nondiscrimination, and affirmatively furthering fair housing as outlined in Section 578.93 of the Continuum of Care Program interim rule and any applicable ESG regulations.

All clients served by an agency that is receiving ESG, CDBG or CoC funding has the following rights:

1. The right to receive all eligible services.
2. The right to be treated with dignity and respect.
3. The right to receive quality services.

Language Access Plan

All recipients and sub-recipients of ESG, CDBG and CoC funding must provide Limited English Proficiency (LEP) persons with meaningful access to federally funded programs. HUD issued new guidance on Fair Housing Act Protections for Persons with Limited English Proficiency on September 15, 2016, and DCA issued its new Language Access Plan (LAP) effective 2016 to 2021 that details its plan to provide LEP persons with meaningful access to programs. DCA will provide guidance and training to State of City of Toledo ESG, CDBG sub-recipients and OH-501 Toledo/Lucas County CoC recipients on providing language access services, including the components of a meaningful LAP, options for translation and interpretation services, and assistance with identifying methods to ensure meaningful access to programs and activities. More information on DCA's Fair Housing Policy can be found at the [Fair Housing Statement](#) page.

Allowable Family Limitations and Prohibition against Involuntary Family Separation

The CoC Interim Rule 24 CFR 578.93 (e) and 24 CFR 576.102(b) explicitly prohibit any kind of involuntary family separation and the denial of admission to selected family members in all CoC Program-funded projects and ESG-funded emergency shelters. It is acceptable for programs to limit participation to only households with children. However, if a project accepts any households with children, they must accept all households with children. This means that any provider that has historically accepted only women with children may not limit their project to that population. They must also accept couples with children or single men with children as well.

In addition, the age and/or gender of a child under age 18 must not be used as a basis for denying any family's admission to a project receiving ESG, CDBG or CoC funding.

Equal Access Requirements

HUD published a final rule on September 21, 2016 entitled Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs that became effective on October 21, 2016. This rule includes the following central provisions:

- All HUD-assisted and HUD-insured housing must be made available without regard to actual or perceived sexual orientation, gender identity, or marital status.
- Owners and administrators of HUD-assisted housing and HUD-insured housing are prohibited from inquiring into an applicant or occupant's sexual orientation and gender identity for the purpose of determining eligibility or otherwise making housing available.
- The definition of "family" is revised to include all families regardless of the actual or perceived sexual orientation, gender identity, or marital status of its members.

This rule shall apply to all ESG, CDBG or CoC-funded projects with two exceptions. This prohibition on inquiries does not prohibit lawful inquiries of an applicant or occupant's sex where the housing provided or to be provided to the individual is temporary, emergency shelter for adults only with a physical configuration such that privacy is a concern, specifically shared bathing areas or shared sleeping areas. A shared bathing area is one in which there are multiple toilet stalls or shower stalls or open showers. Nor does it apply to inquiries made for the purpose of determining the number of bedrooms to which a household may be entitled. In addition, this provision does not prohibit voluntary self-identification of sexual orientation or gender identity by participants. The OH-501 Toledo/Lucas County, including recipients and subrecipients, will comply with the Equal Access Rule at 24 CFR 5.105 and 5.106.

Complete City of Toledo ESG program requirements for written standards, policies and procedures, including ones not addressed in this document, can be found in the City of Toledo's Department of Neighborhoods ESG /CDBG Third-Party Partners Manual.

Violence Against Women Act (VAWA) Requirements

Under the HUD Final Rule Implementing VAWA Reauthorization Act of 2013, the OH-501 Toledo/Lucas County CoC have adopted policies to include provisions for protection of victims of domestic violence, dating violence, sexual assault, sexual battery or stalking, regardless of sex, gender identity, gender expression or actual or perceived sexual orientation.

These policies and procedures apply to CoC-funded Rapid Re-Housing (RRH) and Permanent Supportive Housing (PSH) programs. ESG-funded programs are subject to VAWA policies issued by the administrator of ESG funds. As a part of these policies and procedures, the CoC has put in place a policy for emergency transfers. The full details of the policy can be found in the City of Toledo, Department of Neighborhoods Third-Party Manual ESG / CDBG Guidebook.

STREET OUTREACH PROJECTS

Definition

Street outreach projects are those activities that are undertaken to identify potential homeless project recipients for the purpose of providing them with immediate support and intervention activities.

Eligibility

HUD Requirements

Recipients of these services must meet the HUD definition of homelessness under Category 1. These would be unsheltered homeless individuals and families, meaning those with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.

CoC Recommendations

Agencies administering Street Outreach Projects must have policies on safety standards and procedures.

Engagement should occur during times when there is a reasonable expectation to believe people have no housing options

Required Documentation

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

1. Literally Homeless (in order of preference)
 - a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - b. Written observation by an outreach worker; or
 - c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - d. For individuals exiting an institution – one of the forms of evidence above and;
 - i. Discharge paperwork or written/oral referral, or
 - ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a. Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

2. For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Assessment/ Prioritization

Individuals and families shall be assessed where they are and will be offered the following Street Outreach services, as needed and appropriate: engagement, case management, emergency health and mental health, and transportation services where they are otherwise not available in the mainstream. Based on the need of services population, Street Outreach projects must assess, prioritize, and re-assess the need for essential services related to street outreach, and they should continuously engage unsheltered persons and persons experiencing chronic homelessness (and most at risk of becoming chronically homeless), even if they repeatedly decline housing and services. When appropriate based on

the individual's needs and wishes, the referral to permanent supportive housing or rapid re-housing that can quickly assist the individuals to obtain safe, permanent housing shall be prioritized over the provision of or referral to an emergency shelter. Street Outreach Projects are required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures, which will provide information on prioritization and reassessment for services.

EMERGENCY SHELTERS

Definition

Any facility or project (including hotel/motel voucher projects) where the primary purpose is to provide a temporary shelter for the homeless in general, or for specific populations of the homeless, which does not require occupants to sign leases or occupancy agreements.

Eligibility

HUD Eligibility

Individuals and families entering the shelter system must be homeless per the HUD Homeless Definition, Category 1, literally homeless, Category 2, imminent risk of homelessness, Category 3, homeless under other federal statutes, or Category 4, fleeing or attempting to flee domestic violence (with documentation as detailed elsewhere in this document). Shelter facilities may accept clients that are not HUD-defined homeless, but they must administratively separate those clients so that ESG funds are not used for non-HUD-defined homeless clients.

CoC Recommendations

Projects should have expedited admission processes, to the greatest extent possible, including providing assistance with obtaining necessary documentation. Further, shelters should not require, upon admission, that residents have IDs or be entered into HMIS. Projects should also not require any fees.

Required Documentation

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

1. Literally Homeless (in order of preference)
 - a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - b. Written observation by an outreach worker; or
 - c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - d. For individuals exiting an institution – one of the forms of evidence above and;
 - i. Discharge paperwork or written/oral referral, or
 - ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a. Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

2. For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Assessment /Prioritization

Emergency Shelter projects are required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures. Domestic violence (DV) projects may utilize the coordinated entry system but are not required to participate due to issues of confidentiality. Homeless youth (12 – 18 yrs. of age) may still access shelter through an existing community program. Priority will be given to individuals and families with no income and to those who have extremely low income (30 percent of AMI) as dictated by Area Median Income.

TRANSITIONAL HOUSING PROJECTS (TH)

Definition

Transitional Housing Projects provide subsidized housing and supportive services, for a period not to exceed 24 months, to facilitate the movement of homeless individuals and families to permanent housing.

Eligibility

HUD Eligibility

Individuals and families must be homeless per the HUD Homeless Definition, Category 1, literally homeless or Category 4, fleeing or attempting to flee domestic violence as long as they meet category 1 requirements as well.

CoC Requirements

Priority should be given to individuals and families with no income and to those who have extremely low income (30 percent of AMI) as dictated by Area Median Income. Additional income limits may be set by additional funding sources of the transitional housing project.

The CoC will be assessing project level eligibility criteria in order to identify and remove barriers to accessing services and housing that are experienced by homeless individuals and families. Organizations should be working towards the removal of barriers to project entry, and barriers to remaining in projects, as these barriers both deny housing to individuals and families that really need intensive services and often result in low occupancy rates. Organizations may need to change their project design in order to address this. Entitlement jurisdictions within the CoC may further restrict funding of TH projects to require (and only fund) TH projects that serve high barrier households and/or special needs populations as they determine.

CoC Recommendations

While permanent housing is preferred, research does show that transitional housing may be an effective tool for addressing certain needs, such as housing for underage homeless youth experiencing homelessness, safety for persons fleeing domestic violence, and assisting with recovery from addiction.

Homeless individuals and families entering into TH are not expected to be able to qualify for permanent housing. Further, the enrollment of a chronically homeless client into a TH program causes that client to lose their chronically homeless determination making them ineligible for many programs. In cases where households become eligible for permanent housing, it is expected that TH providers will coordinate with organizations that administer these projects in their area. The provision of supportive services and case management are required to be available in transitional housing projects. Participants cannot be charged more than 30 percent of the total household income as rent.

In order to lower barriers to entry, reduce lengths of stay, and improve exits to permanent housing, the CoC supports the utilization of transitional housing beds as bridge housing for people who are homeless, where shelter beds are not available and permanent housing has been identified. It should

be established at entry that they are chronically homeless and waiting to move into PSH, and the client should not be enrolled into the transitional housing project or be expected to follow service plans associated with the transitional housing project. Please note that there should be a reasonable expectation that the household will move into permanent housing within 30 to 90 days.

Required Documentation

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

- 1) Literally Homeless (in order of preference)
 - a) Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - b) Written observation by an outreach worker; or
 - c) Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - d) For individuals exiting an institution – one of the forms of evidence above and;
 - i) Discharge paperwork or written/oral referral, or
 - ii) Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a. Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

3. For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Assessment/ Prioritization

Transitional housing projects are required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures. Participants may be referred from a broad range of social services including shelter and street outreach. Priority will be given to individuals and families with no income and to those who have extremely low income (30 percent of AMI) as dictated by current HUD limits. Additional income limits may be set by additional funding sources of the transitional housing project.

Families already living in assisted units who qualify for an Emergency Transfer under VAWA, but who do not have a safe unit immediately available for internal transfer, shall have priority over all other applicants for Transitional Housing. Such individual or family shall meet all eligibility criteria required by Federal law or regulation or HUD NOFA, and any established criteria based on 578.93(b)(1), (4), (6), or (7), but shall not be required to meet any other eligibility or preference criteria of the project. The individual or family shall retain their original homeless or chronically homeless status for the transfer.

RAPID RE-HOUSING PROJECTS (RRH)

Definition

Rapid Re-Housing Projects (RRH) provide housing relocation and stabilization services and time limited rental assistance (short- or medium-term rental assistance) and supportive services to help homeless individuals or families move as quickly as possible to permanent housing and achieve stability in that housing.

Eligibility

HUD Eligibility*

Individuals and families must meet the Category 1 definition of homelessness (Literally Homeless). In addition, those who meet the Category 4 definition of homelessness (Fleeing/Attempting to Flee DV) may also qualify if the individual or family is literally homeless. *Please note that an additional eligibility requirement of ESG RRH is that individuals and families must have an annual income at or below 50% AMI.

CoC Requirements

The CoC will be assessing project level eligibility criteria in order to identify and remove barriers to accessing services and housing that are experienced by homeless individuals and families. Organizations should be working towards the removal of barriers to project entry, and barriers to remaining in projects, as these barriers both deny housing to individuals and families that really need intensive services and often result in low occupancy rates. Organizations may need to change their project design in order to address this.

Given that projects should be prioritizing employment assistance and increasing benefits as part of the case management plan, projects should be open to accepting people without current income. Agencies must offer case management and supportive services to all participants receiving rental assistance that are designed to lead them towards long-term stable housing. Case management and related services may be offered to clients not receiving rental assistance at the agency's discretion.

CoC Recommendations

- Agencies should have a goal of providing a 100% subsidy to participating households for no more than six months and to provide any amount of rental subsidy for no longer than twelve months total.
- Assistance for households with no income or special circumstances could be extended to 18 months. An explanation of these special circumstances along with an evaluation of household needs must be documented in the client file.

Rapid Re-Housing Client Contribution Policy

It is the policy of Rapid Re-Housing (RRH) Projects to provide a declining rental assistance subsidy to households participating in the RRH Projects. For households with income, a percentage or amount of client contribution may be based on a reasonable percentage of either the household's income or the monthly rent calculated pursuant to 24 CFR 578.37(a)(1)(ii)(B).

Rent Determination Procedures

- Households will receive a declining subsidy for the duration of their participation in the project based on their ability to contribute to their rent. Rental subsidy determinations will be evaluated no less than monthly in case management meetings. Case managers will review household budget and determine what, if any, amount of rent the household is responsible for contributing

based upon the household's needs and circumstances. The case manager will document the outcome of the subsidy determination in the client file.

- There are many ways to determine the percentage or amount of rent, utilities, and additional financial assistance a household can contribute. Individual projects have discretion in determining how the subsidy will be reduced based on income, the needs of the household, and what is in the best interest of the household's housing stability.

Required Documentation

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

1. Literally Homeless (in order of preference)
 - a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - b. Written observation by an outreach worker; or
 - c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - d. For individuals exiting an institution – one of the forms of evidence above and;
 - i. Discharge paperwork or written/oral referral, or
 - ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a. Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

In addition to the homeless verification required above, income eligibility determination documentation is also required for ESG RRH.

2. All additional required program must be in clients file with 30 days of intake.
3. For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Assessment/ Prioritization

Individuals or families may be referred from a broad range of social services including shelter and street outreach but must follow the OH-501 Toledo/Lucas County CoC policy for the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures. Priority shall be given to extremely low-income individuals and families (at or below 30 percent AMI) and to individuals and families that have longer length of stay in shelters or on the streets.

Families already living in assisted units who qualify for an Emergency Transfer under VAWA, but who do not have a safe unit immediately available for internal transfer, shall have priority over all other applicants for Rapid Re-Housing. Such individual or family shall meet all eligibility criteria required by

Federal law or regulation or HUD NOFA, and any established criteria based on 578.93(b)(1), (4), (6), or (7), but shall not be required to meet any other eligibility or preference criteria of the project. The individual or family shall retain their original homeless or chronically homeless status for the transfer.

CoC Rapid Re-Housing Projects Only

Utility Allowances (CoC funded only)

The OH-501 Toledo/Lucas County CoC Written Standards give individual projects discretion over the amount of rental assistance that can be provided to households, provided that the project provides a declining rental subsidy as described herein. Under certain circumstances, based on how a household's rental contribution is calculated, a project may be required to reimburse households for utilities.

If a project uses rent as a factor in determining a household's contribution, and the household is responsible for making separate utility payments that are not included in the contract rent, then rent must be calculated by adding total monthly rent to the monthly allowance for utilities established by the area's Public Housing Authority (PHA), pursuant to 24 CFR 578.37(a)(1)(ii)(B). In this scenario, households must be reimbursed for any amount that the utility allowance exceeds the household's share of rent.

Further clarifying details may be found in Notice CPD-17-11, issued on October 23, 2017. If this notice is amended, superseded, or rescinded by HUD, the most recent guidance from HUD will apply.

ESG Rapid Re-Housing Projects Only

In addition to the standards above, ESG RRH projects will be subject to the following standards.

Utilities (ESG only)

Households will receive a declining subsidy for the duration of their participation in the project based on their ability to contribute to their utilities. Please note that utility assistance is not eligible under CoC RRH projects.

- Utilities subsidy determinations will be evaluated no less than monthly in case management meetings. Case managers will review household budget and determine what, if any, amount of rent the household is responsible for contributing based upon the household's needs and circumstances. The case manager will document the outcome of the subsidy determination in the client file.
- There are many ways to determine the percentage or amount of rent, utilities, and additional financial assistance a household can contribute. Individual projects have discretion in determining how the subsidy will be reduced based on income, the needs of the household, and what is in the best interest of the household's housing stability.

Housing Stabilization and/or Relocation Services (ESG only)

The type, amount, and duration of financial assistance for housing stabilization and/or relocation services will be determined based on the needs of the household. The need for this assistance will be evaluated and documented in the client file.

HOMELESS PREVENTION PROJECTS

Definition

Homeless Prevention Projects provide assistance to individuals or families who are at the greatest risk of losing housing due to a legal eviction action that requires the individual or family to leave their residence no later than 14 days following the date of their application for homeless assistance.

Eligibility

HUD Eligibility

Households receiving this funding must have an income level below 30% AMI and must demonstrate that they do not have sufficient resources or support networks to prevent them from moving to an emergency shelter or other place defined under Category 1 of the homeless definition. Recipients may be in categories 2-4 under the homeless definition or meet the “at risk” definition in order to qualify for this assistance.

CoC Requirements

The CoC will be assessing project level eligibility criteria in order to identify and remove barriers to accessing services and housing that are experienced by homeless individuals and families. Organizations should be working towards the removal of barriers to project entry, and barriers to remaining in projects, as these barriers both deny housing to individuals and families that really need intensive services and often result in low occupancy rates. Organizations may need to change their project design in order to address this.

CoC Recommendations

Project participants receiving this assistance should receive a case management plan from the provider in order to ensure long term stability. Best practice agencies will be ones with the ability to negotiate with landlords as the first step in resolving eviction crises and that also demonstrate a plan to effectively increase household incomes for project participants. The length of stay should be based on the needs of individual households participating in the project.

- Agencies should have a goal of providing a 100% subsidy to participating households for no more than six months and to provide any amount of rental subsidy for no longer than twelve months total.
- Assistance for households with no income or special circumstances could be extended to 18 months. An explanation of these special circumstances along with an evaluation of household needs must be documented in the client file.

Prevention Client Contribution Policy

It is the policy of Prevention Projects to provide a declining rental assistance subsidy to households participating in the Prevention Projects. For households with income, a percentage or amount of client contribution can be based on a reasonable percentage of a household's income.

Rent Determination Procedures

Households will receive a declining subsidy for the duration of their participation in the project based on their ability to contribute to their rent.

- Rental subsidy determinations will be evaluated no less than monthly in case management meetings. Case managers will review household budget and determine what, if any, amount of rent the household is responsible for contributing based upon the household's needs and circumstances. The case manager will document the outcome of the subsidy determination in the client file.

- There are many ways to determine the percentage or amount of rent, utilities, and additional financial assistance a household can contribute. Individual projects have discretion in determining how the subsidy will be reduced based on income, the needs of the household, and what is in the best interest of the household's housing stability.

Utilities (ESG/CDBG)

Households will receive a declining subsidy for the duration of their participation in the project based on their ability to contribute to their utilities.

- Utilities subsidy determinations will be evaluated no less than monthly in case management meetings. Case managers will review household budget and determine what, if any, amount of rent the household is responsible for contributing based upon the household's needs and circumstances. The case manager will document the outcome of the subsidy determination in the client file.
- There are many ways to determine the percentage or amount of rent, utilities, and additional financial assistance a household can contribute. Individual projects have discretion in determining how the subsidy will be reduced based on income, the needs of the household, and what is in the best interest of the household's housing stability.

Housing Stabilization and/or Relocation Services (ESG/CDBG)

The type, amount, and duration of financial assistance for housing stabilization and/or relocation services will be determined based on the needs of the household. The need for this assistance will be evaluated and documented in the client file.

For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Required Documentation

Households receiving Homeless Prevention assistance must have a lease in the participant's name. Documentation of the pending loss of housing can include an eviction notice, the equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law. A court order is preferred, however, ESG and CDBG Recipients may allow sub-recipients to accept other documentation as allowed by HUD.

Assessment/ Prioritization

All homeless prevention projects are required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures.

SUPPORTIVE SERVICES ONLY PROJECTS (SSO)

Definition

Supportive Services Only (SSO) projects provide services to sheltered and unsheltered homeless persons to whom the provider is not providing housing or housing assistance.

Eligibility

HUD Eligibility

Participants must meet the HUD definition of homelessness under Category 1 (Literally Homeless) or they may fall under Category 4 (Fleeing/Attempting to Flee DV) if they also meet the definition in Category 1.

CoC Requirements

The CoC will be assessing project level eligibility criteria in order to identify and remove barriers to accessing services and housing that are experienced by homeless individuals and families. Organizations should be working towards the removal of barriers to project entry, and barriers to remaining in projects, as these barriers both deny housing to individuals and families that really need intensive services and often result in low occupancy rates. Organizations may need to change their project design in order to address this.

CoC Recommendations

SSO projects are expected to work with participants in order to connect them to permanent housing.

Required Documentation

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

1. Literally Homeless (in order of preference)
 - a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
 - b. Written observation by an outreach worker; or
 - c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
 - d. For individuals exiting an institution – one of the forms of evidence above and;
 - i. Discharge paperwork or written/oral referral, or
 - ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a. Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

Assessment /Prioritization

Supportive Services Projects are required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures.

PERMANENT SUPPORTIVE HOUSING PROJECTS (PSH)

Definition

Permanent Supportive Housing (PSH) projects provide community-based housing and supportive services, without a predetermined length of stay, to assist homeless persons with a disability to live independently. The project will provide safe, affordable housing that meets participants' needs in accordance with HUD guidelines for permanent supportive housing projects.

Eligibility

HUD Requirements

In order to be served in a CoC-funded PSH project (individuals or family households) participants must meet the following project eligibility requirements:

- Participants must meet the applicable HUD definition of homelessness (category 1 or category 4); and
- PSH can only provide assistance to individuals with disabilities and families in which at least one adult or child has a disability.

ELIGIBILITY CRITERIA FOR DedicatedPLUS Projects (Section III.C.2.g of the FY 2019 CoC Program NOFA):

A DedicatedPLUS project is a permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals, households with children, and unaccompanied homeless youth that at intake meet one of the following categories:

- (1) experiencing chronic homelessness as defined in 24 CFR 578.3;
- (2) residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
- (3) residing in a place not meant for human habitation, emergency shelter, or safe haven and had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement and met the definition of chronic homelessness as defined at 24 CFR 578.3 prior to entering the project;
- (4) residing in transitional housing funded by a Joint TH and PH-RRH component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3;
- (5) residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions and the individual or head of household meets the definition of 'homeless individual with a disability'; or
- (6) receiving assistance through a Department of Veterans Affairs (VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

CoC Requirements

The CoC will be assessing project level eligibility criteria in order to identify and remove barriers to accessing services and housing that are experienced by homeless individuals and families. Organizations should be working towards the removal of barriers to project entry, and barriers to remaining in projects, as these barriers both deny housing to individuals and families that really need intensive services and often result in low occupancy rates. Organizations may need to change their project design in order to address this.

CoC Recommendations

Service Provision Criteria:

1. In providing or arranging for housing, the project considers the needs of the individual or family experiencing homelessness.
2. The project provides assistance in accessing suitable housing.
3. The project may provide assistance with moving costs.
4. The project signs occupancy agreements or leases (or subleases) with all project participants residing in housing.
5. The project enters into an occupancy agreement or lease agreement (or sublease) with project participant for a term of at least once year, which is terminable for cause. The lease must be automatically renewable upon expiration for a minimum term of one month. Assistance may be extended as stated in 24 CFR 578.79.
6. For projects where regulations require individuals and families residing in permanent supportive housing to pay occupancy charges or rent, occupancy charges and rent may not exceed those specified in 24 CFR 578.77.
7. At least 90 percent of the CoC Program-funded permanent supportive housing beds that become available through turnover must be prioritized for chronically homeless individuals and families, or are in projects classified as DedicatedPLUS as defined in III.C.2.g. of HUD's 2019 CoC Program Competition NOFA. However, CoC-funded PSH projects that commit above this amount in a competition, are held to the higher amount.

In terminating assistance to a program participant, the interim rule provides that a recipient or subrecipient must provide a formal process that recognizes the due process of law. Recipients or subrecipients that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all circumstances in determining whether termination is appropriate. Under the Continuum of Care Interim Rule, it was determined that a participant's assistance should be terminated only in the most severe cases.

Required Documentation

As defined in the HEARTH Act, eligibility for Permanent Supportive Housing is limited to categories 1 and 4 (Fleeing/Attempting to Flee DV) if they also meet the definition in Category 1. Participants must also:

- a. Enter from the street or shelter, or a transitional housing project to which they originally entered from the street or shelter (NOTE: if the project is designated for chronically homeless, they may only enter from the street or shelter. Individuals may lose their chronically homeless designation after they are enrolled into a transitional housing project); and
- b. The head of household, or at least one member of the household, must have a disability of long duration, verified either by Social Security or a licensed professional that meets the state criteria for diagnosing and treating that condition*.

*HUD's Sample Chronic Homelessness Documentation – 2016 guidance, which includes a list of acceptable documentation to verify disability status, can be found at:

<https://www.hudexchange.info/resources/documents/Sample-Chronic-Homelessness-Documentation-Form-2016.docx>.

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

1. Literally Homeless (in order of preference)

- a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
- b. Written observation by an outreach or intake worker; or
- c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;
- d. For individuals exiting an institution – one of the forms of evidence above and;
 - i. Discharge paperwork or written/oral referral, or
 - ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

If the provider is using anything other than a Third-Party Verification, the case file must include documentation of due diligence to obtain third party verification. Appendix VI provides more details on exactly what is needed in the case file.

2. For all ESG/CDBG funded agencies, also refer to the ESG/CDBG Third Party Manual for additional guidelines for required documentation.

Assessment/Prioritization

Permanent Supportive Housing Projects are required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures.

Recipients of CoC Program-funded PSH are required to follow the order of priority when selecting participants for housing in accordance with the OH-501 Toledo/Lucas County CoC's written standards while also considering the goals and any identified target populations served by the project in a manner that is consistent with their current grant agreement. These standards and the order of priority is listed below, and the OH-501 Toledo/Lucas County CoC approved Permanent Supportive Housing Written Standards and Chronic Prioritization policy is located in Appendix VI of this document.

Note: Families already living in assisted units who qualify for an Emergency Transfer under VAWA, but who do not have a safe unit immediately available for internal transfer, shall have priority over all other applicants for Permanent Supportive Housing. Such individual or family shall meet all eligibility criteria required by Federal law or regulation or HUD NOFA, and any established criteria based on 578.93(b)(1), (4), (6), or (7), but shall not be required to meet any other eligibility or preference criteria of the project. The individual or family shall retain their original homeless or chronically homeless status for the transfer.

A. Order of Priority in CoC Program-funded Permanent Supportive Housing Beds Dedicated to Persons Experiencing Chronic Homelessness and Permanent Supportive Housing Prioritized for Occupancy by Persons Experiencing Chronic Homelessness.

First Priority

Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs

Second Priority

Chronically Homeless Individuals and Families with the Longest History of Homelessness

Third Priority

Chronically Homeless Individuals and Families with the Most Severe Service Needs

Fourth Priority

All Other Chronically Homeless Individuals and Families

B. Order of Priority in Permanent Supportive Housing Beds Not Dedicated or Prioritized for Persons Experiencing Chronic Homelessness

First Priority

Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs

Second Priority

Homeless Individuals and Families with a Disability with Severe Service Needs

Third Priority

Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters Without Severe Service Needs

Fourth Priority

Homeless Individuals and Families with a Disability Coming from Transitional Housing

The OH-501 Toledo/Lucas County CoC adopts HUD's Notice CPD-16-11, Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing Notice issued on July 25, 2016, in that those experiencing chronic homelessness should be given priority for non-dedicated PSH beds as vacancies become available through turnover. PSH renewal projects serving specific disabled subpopulations (e.g., persons with mental illness or persons with substance abuse issues) must continue to serve those groups, as required in the current grant agreement. However, the chronically homeless within the specified subpopulation should be prioritized for entry as described below. The full notice, which includes related recordkeeping requirements can be found at: <https://www.hudexchange.info/resource/5108/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh/>. This policy supersedes previous policy adopting Notice CPD-14-012.

Prioritization of DedicatedPLUS Projects When There Are No Eligible Households

At the point in which a vacancy occurs, if there are no eligible households identified who are ready to accept assistance, recipients should consider the following:

- Where there are no chronically homeless persons identified, Dedicated PSH beds included in DedicatedPLUS projects may fill the vacancy either in accordance with section III.B.1.(b)-(d) of Notice CPD-16-11 or households eligible for DedicatedPLUS as outlined in Section III.C.2.g of the FY 2019 CoC Program NOFA.
- Where there are no persons meeting the eligibility criteria for DedicatedPLUS as outlined in Section III.C.2.g of the FY 2019 CoC Program NOFA, recipients should follow the order of priority outlined in section III.B.1.(b)-(d) of Notice CPD-16-11 to fill any vacancies. At a minimum, the CoC should consider the total length of time the potential program participant has been residing in a place not meant for human habitation, emergency shelter, or safe haven and severity of service needs.

- The recipient must always continue to prioritize households that are eligible for DedicatedPLUS (and dedicated PSH, if applicable). This means that anytime there is a new vacancy, the recipient must always first seek to fill it with an eligible household even if it was most recently used to serve a household that would not otherwise be eligible due to the circumstances outlined above.

For purposes of prioritization as referenced above in Section III.B.1.(b)-(d) of Notice CPD-16-11 (referenced from Appendix VIII of this document), the required order of prioritization is as follows for DedicatedPLUS projects, when there are no eligible households:

First Priority

Homeless Individuals and Families with a Disability with Severe Service Needs

Second Priority

Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters Without Severe Service Needs

Third Priority

Homeless Individuals and Families with a Disability Coming from Transitional Housing

The overarching goal of adopting this Notice is to ensure that the homeless individuals and families with the most severe service needs within a community are prioritized in all PSH, which will also increase progress towards the OH-501 Toledo/Lucas County CoC's goal of ending chronic homelessness. This will also guide projects in ensuring that all CoC Program-funded PSH beds are used most effectively. HUD's Notice CPD-16-11, and this policy, revises the orders of priority related how

persons should be selected for PSH as previously established in Notice CPD-14-012 to reflect the changes to the definition of chronically homeless as defined in the Chronically Homeless final rule.

Due diligence must be exercised when conducting outreach and assessment to ensure that chronically homeless individuals and families are prioritized for assistance based on their initial length of time homeless and/or the severity of their needs in the OH-501 Toledo/Lucas County CoC. Consistent with HUD's expectations for recipients of dedicated permanent supportive housing (PSH) projects, recipients of DedicatedPLUS projects will be expected to exercise due diligence when conducting outreach and assessment to locate and engage eligible households. HUD and the OH-501 Toledo/Lucas County CoC recognize that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing. Recipients of CoC Program-funded PSH are not required to allow units to remain vacant indefinitely while waiting for an identified chronically homeless person to accept an offer of PSH. CoC Program-funded PSH providers are encouraged to follow a Housing First approach to maximum extent practicable, and recipients of DedicatedPLUS projects should be following a Housing First approach to the maximum extent practicable. Therefore, a person experiencing chronic homelessness should not be forced to refuse an offer of PSH if they do not want to participate in the project's services, nor should a PSH project have eligibility criteria or preconditions to entry that systematically exclude those with severe service needs. Street outreach and housing providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these chronically homeless persons must continue to be prioritized for PSH until they are housed.

Recordkeeping Recommendations for the Orders of Priority in this Notice:

24 CFR 578.103(a)(4) of the [CoC Program Interim Rule](#) outlines documentation requirements for all recipients of dedicated and non-dedicated CoC Program-funded PSH associated with determining

whether or not an individual or family is chronically homeless for the purposes of eligibility. In addition to those requirements, the OH-501 Toledo/Lucas County CoC expects that CoC recipients of CoC Program-funded PSH, will maintain evidence of implementing these priorities. Evidence of following these orders of priority may be demonstrated by:

- A. **Evidence of Severe Service Needs.** Evidence of severe service needs is that by which the recipient is able to determine the severity of needs as defined in Appendix VI of the Written Standards using data-driven methods such as an administrative data match or through the use of a standardized assessment. The documentation should include any information pertinent to how the determination was made, such as notes associated with case-conferencing decisions.
- B. **Evidence that the Recipient is Following the CoC's Written Standards for Prioritizing Assistance.** Recipients must follow the CoC's written standards for prioritizing assistance, as adopted by the CoC. In accordance with the CoC's adoption of written standards for prioritizing assistance, recipients must in turn document that the CoC's revised written standards have been incorporated into the recipient's intake procedures and that the recipient is following its intake procedures when accepting new project participants into the project.
- C. **Evidence that there are no Households Meeting Higher Order of Priority within CoC's Geographic Area.**
 - a. When dedicated and prioritized PSH is used to serve non-chronically homeless households, the recipient of CoC Program-funded PSH should document how it was determined that there were no chronically homeless households identified for assistance within the CoC's geographic area – or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area – at the point in which a vacancy became available. This documentation should include evidence of the outreach efforts that had been undertaken to locate eligible chronically homeless households within the defined geographic area and, where chronically homeless households have been identified but have not yet accepted assistance, the documentation should specify the number of persons that are chronically homeless that meet this condition and the attempts that have been made to engage the individual or family. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence.
 - b. When non-dedicated and non-prioritized PSH is used to serve an eligible individual or family that meets a lower order of priority, the recipient of CoC Program-funded PSH should document how the determination was made that there were no eligible individuals or families within the CoC's geographic area - or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area that met a higher priority. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence that there were no households identified within the CoC's geographic area that meet a higher order of priority.
 - c. Documentation for DedicatedPLUS Projects: Recipients of DedicatedPLUS PSH projects must maintain records to document efforts to locate persons meeting the eligibility criteria in Section III.C.2.g of the FY 2019 CoC Program NOFA. Ideally, the CoC should have comprehensive and high- quality data on all households that are currently presenting for assistance within the CoC that is informed by a comprehensive outreach strategy. To justify serving a non-eligible household, a recipient of DedicatedPLUS projects must have documentation from the CoC that demonstrates that outreach is occurring regularly and that the CoC is making reasonable efforts to locate and identify all persons experiencing homelessness within the community.

HUD CRITERIA FOR DEFINING HOMELESS	Category 1	Literally Homeless	<p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> • Has a primary nighttime residence that is a public or private place not meant for human habitation; • Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing (only for ESG) and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or • Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
	Category 2	Imminent Risk of Homelessness	<p>(2) Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> • Residence will be lost within 14 days of the date of application for homeless assistance; • No subsequent residence has been identified; and • The individual or family lacks the resources or support networks needed to obtain other permanent housing
	Category 3	Homeless under other Federal statutes	<p>(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> • Are defined as homeless under the other listed federal statutes; • Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; • Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; and • Can be expected to continue in such status for an extended period of time due to special needs or barriers
	Category 4	Fleeing/ Attempting to Flee DV	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> • Is fleeing, or is attempting to flee, domestic violence; • Has no other residence; and • Lacks the resources or support networks to obtain other permanent housing

Appendix II: HUD Definition for “At Risk of Homelessness”:

HUD DEFINITION FOR AT-RISK OF HOMELESSNESS	Category 1	Individuals and Families	<p>An individual or family who: Has an annual income below 30% of median family income for the area; AND Does not have sufficient resources or support networks, e.g. family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; AND Meets one of the following conditions:</p> <p>A. Has moved because of economic reasons 2 or more times during the 60 days immediately preceding their application for assistance; OR B. Is living in the home of another because of economic hardship; OR C. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days of the date of application for assistance; OR D. Lives in a hotel or motel and the cost of the hotel or motel stay is not covered by any federal, State, or local government programs for low-income assistance: OR E. Lives in a single-room occupancy or efficiency apartment unit in which there resides more than 2 persons or lives in a larger housing unit in which there reside more than 1.5 persons per room; OR F. Is exiting a publicly funded institution, or system of care; OR G. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness as identified in the recipient’s approved Consolidated Plan.</p>
	Category 2	Unaccompanied Children and Youth	<p>A child or youth who does not qualify as homeless under HUD’s “homeless” definition but qualifies as homeless under another federal statute as outlined in the CoC Interim Rule at 578.3.</p>
	Category 3	Families with Children and Youth	<p>A child or youth who does not qualify as “homeless” under HUD’s homeless definition but does qualify as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) of that child or youth if living with her or him.</p>

Appendix III: Eligibility by Component (CoC Program)

ELIGIBILITY BY COMPONENT (CoC Program-funded Projects)	Supportive Services	<p>Individuals and Families defined as Homeless under the following categories are eligible for assistance in SSO projects:</p> <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 2 – Imminent Risk of Homeless • Category 3* – Homeless Under Other Federal Statutes • Category 4 – Fleeing/Attempting to Flee DV
	Rapid Re- housing	<p>Individuals defined as Homeless under the following categories are eligible for assistance in RRH projects:</p> <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1) <p>ESG-funded RRH projects have the following additional limitations on eligibility:</p> <ul style="list-style-type: none"> • Must only serve individuals and families that have an annual income at or below 50% of AMI
	Transitional Housing	<p>Individuals and Families defined as Homeless under the following categories are eligible for assistance in TH projects:</p> <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 2 – Imminent Risk of Homeless • Category 3* – Homeless Under Other Federal Statutes (N/A OH-501 Toledo/Lucas County CoC*) • Category 4 – Fleeing/Attempting to Flee DV
	Permanent Supportive Housing	<p>Individuals and families defined as Homeless under the following categories are eligible for assistance in PSH projects:</p> <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 4 – Fleeing/Attempting to Flee DV <p>PSH projects have the following additional NOFA limitations on eligibility within Category 1:</p> <ul style="list-style-type: none"> • Individuals and Families coming from TH must have originally come from the streets or emergency shelter • Individuals and Families must also have an individual family member with a disability <p>Projects that are dedicated chronically homeless projects, including those that were originally funded as Samaritan Bonus Initiative Projects must continue to serve chronically homeless persons exclusively</p>

* Projects must be located within a CoC that has received HUD approval to serve this category. For more information about receiving HUD approval, please read: Notice on Limitation on Use of Funds to Serve Persons Defined as Homeless Under Other Federal Laws at: <https://www.hudexchange.info/resource/1988/notice-limitation-use-funds-serve-persons-defined-homeless-other-laws/>. Category 3 is not applicable for OH-501 Toledo/Lucas County CoC-funded programs.

Appendix IV: Eligibility by Category (Emergency Solutions Grant Program)

ELIGIBILITY BY COMPONENT (Emergency Solutions Grants Program)	Street Outreach	<p>Individuals defined as Homeless under the following categories are eligible for assistance in SO:</p> <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1) <p>SO projects have the following additional limitations on eligibility within Category 1:</p> <ul style="list-style-type: none"> • Individuals and families must be living on the streets (or other places not meant for human habitation) and be unwilling or unable to access services in emergency shelter
	Emergency Shelter	<p>Individuals and Families defined as Homeless under the following categories are eligible for assistance in ES projects:</p> <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 2 – Imminent Risk of Homeless • Category 3 – Homeless Under Other Federal Statutes • Category 4 – Fleeing/Attempting to Flee DV
	Rapid Re-housing	<p>Individuals defined as Homeless under the following categories are eligible for assistance in RRH projects:</p> <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1) <p>ESG-funded RRH projects have the following additional limitations on eligibility:</p> <ul style="list-style-type: none"> • Must only serve individuals and families that have an annual income at or below 50% of AMI

	Homelessness Prevention	<p>Individuals and Families defined as Homeless under the following categories are eligible for assistance in HP projects:</p> <ul style="list-style-type: none"> • Category 2 –Imminent Risk of Homeless • Category 3 – Homeless Under Other Federal Statutes • Category 4 – Fleeing/Attempting to Flee DV <p>Individuals and Families who are defined as At Risk of Homelessness are eligible for assistance in HP projects.</p> <p>HP projects have the following additional limitations on eligibility with homeless and at risk of homeless:</p> <ul style="list-style-type: none"> • Must only serve individuals and families that have an annual income below 30% of AMI
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Appendix V: Eligibility Documentation Requirements for ESG and CoC Program- funded Projects

As set forth in the HEARTH Act, there are four categories of eligibility: 1) Literally Homeless, 2) Imminent Risk of Homelessness, 3) Homeless Under Other Federal Statutes (subject to limitation in the OH-501 Toledo/Lucas County CoC), and 4) Fleeing/Attempting to Flee Domestic Violence. Projects located within the OH-501 Toledo/Lucas County Continuum of Care jurisdiction are limited to serving categories 1, 2, and 4 due to the shortage of resources for those priority populations and excessive demand. Category two is further limited to those who will be literally homeless within 14 days, aligning eligibility with the Emergency Solutions Grant. Documentation for those at risk of homelessness may also be accepted as allowed under Category 1: Risk Factor (C) of the At Risk of Homelessness definition as allowed by HUD.

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as noted in the table on the following page:

ELIGIBILITY DOCUMENTATION/RECORDKEEPING REQUIREMENTS	Category 1	Literally Homeless	<p>a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); OR</p> <p>b. Written observation by an outreach worker; OR</p> <p>c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;</p> <p>d. For individuals exiting an institution – one of the forms of evidence above and;</p> <p>i. Discharge paperwork or written/oral referral, or</p> <p>ii. Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited the institution</p> <p>If the provider is using anything other than Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.</p>
	Category 1: Risk Factor (C)	Category 1: Risk Factor (C) of the At-Risk of Homelessness	<p>Eligibility documentation for Category 1: Risk Factor (C) of the At-Risk of Homelessness definition does not need to be equivalent to a court-ordered eviction action. Acceptable documentation must substantiate that a household's right to occupy housing will be terminated within 21 days, not necessarily that the household will be required to leave the unit within 21 days.</p> <p>In order to sufficiently document that the criteria for Category 1C have been met, other documentation, such as an eviction notice prepared by the landlord or a demand notice, must effectively terminate a household's right to occupy the unit within 21 days. If the documentation provides a way for the tenant to remedy the situation and avoid eviction, e.g., paying the balance, the applicant must lack the ability to meet the terms of avoiding eviction in order to be eligible for assistance.</p>
	Category 2	Imminent Risk of Homelessness	<p>a. A court order resulting from an eviction action notifying the individual or family that they must leave within 14 days; OR</p> <p>b. For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; OR</p> <p>c. A documented and verified written or oral statement that the individual or family will be literally homeless within 14 days; AND</p> <p>d. Certification that no subsequent residence has been identified; AND</p> <p>e. Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.</p>
	Category 3	Homeless under other Federal statutes	<p>CoC-funded projects - N/A (Ineligible)</p> <p>ESG-funded projects (ONLY shelter or prevention IF allowed):</p> <p>i. Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; AND</p> <p>ii. Certification of no PH in the last 60 days; AND</p> <p>iii. Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the last 60 days; AND</p> <p>iv. Documentation of special needs or 2 or more barriers</p>

	Category 4	Fleeing/ Attempting to Flee DV	<p>For victim service providers:</p> <ul style="list-style-type: none"> i. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker. <p>For non-victim service providers:</p> <ul style="list-style-type: none"> i. Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; AND ii. Certification by the individual or head of household that no subsequent residence has been identified; AND iii. Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.
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PERMANENT SUPPORTIVE HOUSING PROJECTS (PSH)

Permanent Supportive Housing (PSH) projects provide community-based housing and supportive services, without a predetermined length of stay, to assist homeless persons with a disability to live independently.

STANDARD:

The project will provide safe, affordable housing that meets participants' needs in accordance with HUD guidelines for permanent supportive housing projects.

SERVICE PROVISION CRITERIA:

3. In providing or arranging for housing, the project considers the needs of the individual or family experiencing homelessness.
4. The project provides assistance in accessing suitable housing.
5. The project may provide assistance with moving costs.
6. The project signs occupancy agreements or leases (or subleases) with all project participants residing in housing.
7. The project enters into an occupancy agreement or lease agreement (or sublease) with project participant for a term of at least once year, which is terminable for cause. The lease must be automatically renewable upon expiration for a minimum term of one month. Assistance may be extended as stated in 24 CFR 578.79.
8. For projects where regulations require individuals and families residing in permanent supportive housing to pay occupancy charges or rent, occupancy charges and rent may not exceed those specified in 24 CFR 578.77.
9. At least 90 percent of the CoC Program-funded permanent supportive housing beds that become available through turnover must be prioritized for chronically homeless individuals and families, or are in projects classified as DedicatedPLUS as defined in III.C.2.g. of HUD's 2019 CoC Program Competition NOFA. However, CoC-funded PSH projects that commit above this amount in a competition, are held to the higher amount.

ELIGIBILITY CRITERIA:

In order to be served in a CoC-funded PSH project (individuals or family households) participants must meet the following program eligibility requirements:

- Participants must meet the applicable HUD definition of homelessness (category 1 or category 4); and
- PSH can only provide assistance to individuals with disabilities and families in which at least one adult or child has a disability.

ELIGIBILITY CRITERIA FOR DedicatedPLUS Projects (Section III.C.2.g of the FY 2019 CoC

Program NOFA): A DedicatedPLUS project is a permanent supportive housing project where 100 percent of the beds are dedicated to serve individuals with disabilities and families in which one adult or child has a disability, including unaccompanied homeless youth that at intake are:

1. experiencing chronic homelessness as defined in 24 CFR 578.3;
2. residing in a transitional housing project that will be eliminated and meets the definition of chronically homeless in effect at the time in which the individual or family entered the transitional housing project;
3. residing in a place not meant for human habitation, emergency shelter, or safe haven; but the individuals or families experiencing chronic homelessness as defined at 24 CFR 578.3

- had been admitted and enrolled in a permanent housing project within the last year and were unable to maintain a housing placement;
4. residing in transitional housing funded by a Joint TH and PH-RRH component project and who were experiencing chronic homelessness as defined at 24 CFR 578.3 prior to entering the project;
 5. residing and has resided in a place not meant for human habitation, a safe haven, or emergency shelter for at least 12 months in the last three years, but has not done so on four separate occasions; or
 6. receiving assistance through a Department of Veterans Affairs(VA)-funded homeless assistance program and met one of the above criteria at initial intake to the VA's homeless assistance system.

Priority is given to chronically homeless individuals and families as defined by HUD, where a family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (a) or (b) of the chronically homeless definition as described on page 6 of this appendix, including a family whose composition has fluctuated while the head of household has been homeless. Please note that to meet the criteria set forth in the chronically homeless definition, in addition to meeting criteria around literal homelessness and length of time homeless, the statutory definition also requires that the head of household has a diagnosable disability as determined in the final rule.

Recipients that are providing permanent supportive housing for hard-to-house populations of homeless persons must exercise judgment and examine all circumstances in determining whether termination is appropriate. Under the Continuum of Care Interim Rule, it was determined that a participant's assistance should be terminated only in the most severe cases.

The OH-501 Toledo/Lucas County CoC adopts HUD's Notice CPD-16-11, Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing Notice issued on July 25, 2016, in that those experiencing chronic homelessness should be given priority for non-dedicated PSH beds as vacancies become available through turnover. PSH renewal projects serving specific disabled subpopulations (e.g., persons with mental illness or persons with substance abuse issues) must continue to serve those groups, as required in the current grant agreement. However, the chronically homeless within the specified subpopulation should be prioritized for entry as described below. The full notice, which includes related recordkeeping requirements can be found at: <https://www.hudexchange.info/resources/documents/notice-cpd-16-11-prioritizing-persons-experiencing-chronic-homelessness-and-other-vulnerable-homeless-persons-in-psh.pdf>. As updated HUD's 2018 CoC Program Competition NOFA, at least 90 percent of the CoC program-funded permanent supportive housing beds that become available through turnover must be prioritized for chronically homeless individuals and families, or are in projects classified as DedicatedPLUS as defined in III.C.2.g. This policy update is being made to policy adopting Notice CPD-16-11.

The overarching goal of adopting this Notice is to ensure that the homeless individuals and families with the most severe service needs within a community are prioritized in all PSH, which will also increase progress towards the OH-501 Toledo/Lucas County CoC's goal of ending chronic homelessness. This will also guide projects in ensuring that all CoC Program-funded PSH beds are used most effectively. HUD's Notice CPD-16-11, and this policy, revises the orders of priority related how persons should be selected for PSH as previously established in Notice CPD-14-012 to reflect the changes to the definition of chronically homeless as defined in the Chronically Homeless final rule.

Recipients of CoC Program-funded PSH are required to follow the order of priority when selecting participants for housing in accordance with the OH-501 Toledo/Lucas County CoC's written standards while also considering the goals and any identified target populations served by the project, in a manner consistent with their current grant agreement.

Due diligence must be exercised when conducting outreach and assessment to ensure that chronically homeless individuals and families are prioritized for assistance based on their total length of time homeless and/or the severity of their needs in the OH-501 Toledo/Lucas County CoC. Consistent with HUD's expectations for recipients of dedicated permanent supportive housing (PSH) projects, recipients of DedicatedPLUS projects will be expected to exercise due diligence when conducting

outreach and assessment to locate and engage eligible households as outlined in Section III.C.2.g. of the FY 2019 CoC Program NOFA. HUD and the OH-501 Toledo/Lucas County CoC recognize that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing. Recipients of CoC Program-funded PSH are not required to allow units to remain vacant indefinitely while waiting for an identified chronically homeless person to accept an offer of PSH. CoC Program-funded PSH providers are encouraged to follow a Housing First approach to maximum extent practicable, and recipients of DedicatedPLUS projects should be following a Housing First approach to the maximum extent practicable. Therefore, a person experiencing chronic homelessness should not be forced to refuse an offer of PSH if they do not want to participate in the project's services, nor should a PSH project have eligibility criteria or preconditions to entry that systematically exclude those with severe service needs. Street outreach and housing providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these chronically homeless persons must continue to be prioritized for PSH until they are housed.

PRIORITIZATION of CHRONICALLY HOMELESS

Order of Priority in CoC Program-funded Permanent Supportive Housing

As a reminder, recipients of CoC Program-funded PSH are required to prioritize otherwise eligible households in a nondiscriminatory manner. Project implementation, including any prioritization policies, must be implemented consistent with the nondiscrimination provisions of the Federal civil rights laws, including, but not limited to the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Title II or III of the Americans with Disabilities Act, as applicable. For example, while it is acceptable to prioritize based on level of need for the type of assistance being offered, prioritizing based on specific disabilities would not be consistent with fair housing requirements or program regulations.

Note: Families already living in assisted units who qualify for an Emergency Transfer under VAWA, but who do not have a safe unit immediately available for internal transfer, shall have priority over all other applicants for Permanent Supportive Housing. Such individual or family shall meet all eligibility criteria required by Federal law or regulation or HUD NOFA, and any established criteria based on 578.93(b)(1), (4), (6), or (7), but shall not be required to meet any other eligibility or preference criteria of the project. The individual or family shall retain their original homeless or chronically homeless status for the transfer.

A. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Dedicated or Prioritized for Occupancy by Persons Experiencing Chronic.

First Priority:

Chronically Homeless Individuals and Families with the Longest History of Homelessness and with the Most Severe Service Needs.

A chronically homeless individual or head of household as defined in 24 CFR Parts 91 and 578, for whom both of the following are true:

1. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and
2. The CoC or CoC Program recipient has identified the chronically homeless individual or head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs (see Section I.D.3. of this Notice for definition of severe service needs).

Second Priority:

Chronically Homeless Individuals and Families with the Longest History of Homelessness.

A chronically homeless individual or head of household, as defined in 24 CFR Parts 91 and 578, for which both of the following are true:

1. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and,
2. The CoC or CoC program recipient has **not** identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

Third Priority:

Chronically Homeless Individuals and Families with the Most Severe Service Needs.

A chronically homeless individual or head of household as defined in 24 CFR Parts 91 and 578, for whom both of the following are true:

1. The chronically homeless individual or head of household of a family has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter on at least four separate occasions in the last 3 years, where the total length of those separate occasions equals less than 12 months; and
2. The CoC or CoC program recipient has identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

Fourth Priority:

All Other Chronically Homeless Individuals and Families.

A chronically homeless individual or head of household as defined in 24 CFR Parts 91 and 578, for whom both of the following are true:

1. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length the four occasions is **less than** 12 months; and
2. The CoC or CoC program recipient has **not** identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

Where a CoC or a recipient of CoC Program-funded PSH beds that are dedicated or prioritized is not able to identify chronically homeless individuals and families as defined in 24 CFR Parts 91 and 578 within the CoC, the order of priority in the section below (*B. Order of Priority in Permanent Supportive Housing Beds Not Dedicated or Prioritized for Persons Experiencing Chronic Homelessness*) may be followed.

B. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Not Dedicated or Not Prioritized for Occupancy by Persons Experiencing Chronic Homelessness

First Priority:

Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months **and** has been identified as having severe service needs.

Second Priority:

Homeless Individuals and Families with a Disability Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

Third Priority:

Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters Without Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

Fourth Priority:

Homeless Individuals and Families with a Disability Coming from Transitional Housing.

An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

Prioritization of DedicatedPLUS Projects When There Are No Eligible Households

At the point in which a vacancy occurs, if there are no eligible households identified who are ready to accept assistance, recipients should consider the following:

- Where there are no chronically homeless persons identified, Dedicated PSH beds included in DedicatedPLUS projects may fill the vacancy *either* in accordance with section III.B.1.(b)-(d) of Notice CPD-16-11 or households eligible for DedicatedPLUS as outlined in Section III.C.2.g of the FY 2019 CoC Program NOFA.
- Where there are no persons meeting the eligibility criteria for DedicatedPLUS as outlined in Section III.C.2.g of the FY 2019 CoC Program NOFA, recipients should follow the order of priority outlined in section III.B.1.(b)-(d) of Notice CPD-16-11 to fill any vacancies. At a minimum, the CoC should consider the total length of time the potential program participant has been residing in a place not meant for human habitation, emergency shelter, or safe haven and severity of service needs.
- The recipient must always continue to prioritize households that are eligible for DedicatedPLUS (and dedicated PSH, if applicable). This means that anytime there is a new vacancy, the recipient must always first seek to fill it with an eligible household even if it was most recently used to serve a household that would not otherwise be eligible due to the circumstances outlined above.

For purposes of prioritization as referenced above in Section III.B.1.(b)-(d) of Notice CPD-16-11 (referenced from Appendix VIII of this document), the required order of prioritization as follows for DedicatedPLUS projects, when there are no eligible households:

First Priority:

Homeless Individuals and Families with a Disability Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

Second Priority:

Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Havens, or Emergency Shelters Without Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

Third Priority:

Homeless Individuals and Families with a Disability Coming from Transitional Housing.

An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

PROCEDURE:

Permanent Supportive Housing Projects will be required to utilize the Coordinated Entry Process as outlined in the Coordinated Entry Written Standards Policies and Procedures.

Key Terms:

Homeless means (To be eligible for permanent supportive housing, people must meet the federal criteria under category [1] or [4] of the “homeless” definition in 24 578.3):

- 1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
 - iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Disabling Condition (Disability) means:

- A person shall be considered to have a disabling condition if he or she has a condition that:
 - Is expected to be long-continuing or of indefinite duration;
 - Substantially impedes the individual's ability to live independently;
 - Could be improved by the provision of more suitable housing conditions; and
 - Can be diagnosed as one or more of the following conditions: substance abuse disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post- traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability (page 53, CoC Interim Rule).
- A person will also be considered to have a disability if he or she has acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome, including infection with the human immunodeficiency virus (HIV).

Chronically Homeless means:

- A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - Has been homeless and living as described in paragraph (a)(i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (a)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;
- An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (a) of this definition, before entering that facility; or

- A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (a) or (b) of this definition described above, including a family whose composition has fluctuated while the head of household has been homeless.

HUD's *Sample Chronic Homelessness Documentation – 2016* guidance can be found at:

<https://www.hudexchange.info/resources/documents/Sample-Chronic-Homelessness-Documentation-Form-2016.docx>.

Housing First means:

Housing First is a model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions for entry (such as sobriety or a minimum income threshold). HUD encourages all recipients of CoC Program-funded PSH to follow a Housing First approach to the maximum extent practicable.

Any CoC-funded recipient/subrecipient that indicated that they would follow a Housing First approach in a CoC Project Application must continue to do so in subsequent years, as the CoC score for that CoC Program Competition was affected by the extent in which project applications indicated that they would follow this approach and this requirement will be incorporated into the recipient's HUD grant agreement.

Severity of Service Needs means (as defined in HUD Notice CPD-16-11, these PSH written standards refer to persons who have been identified as having the most severe service needs):

(a) For the purpose of these standards, this means an individual for whom at least one of the following is true:

- i. History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or
- ii. Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing.
- iii. For youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.
- iv. When applicable CoCs and recipients of CoC Program-funded PSH may use an alternate criteria used by Medicaid departments to identify high-need, high cost beneficiaries.

(b) Severe service needs as defined in paragraphs i. - iv. above should be identified and verified through data- driven methods such as an administrative data match or through the use of a standardized assessment tool and process and should be documented in a project participant's case file. The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual. The determination cannot be made based on any factors that would result in a violation of any nondiscrimination and equal opportunity requirements, see C.F.R. § 5.105(a).

Recordkeeping Recommendations for the Orders of Priority in this Notice:

24 CFR 578.103(a)(4) of the [CoC Program Interim Rule](#) outlines documentation requirements for all recipients of dedicated and non-dedicated CoC Program-funded PSH associated with determining whether or not an individual or family is chronically homeless for the purposes of eligibility. In addition to those requirements, the OH-501 Toledo/Lucas County CoC expects that CoC recipients of CoC Program-funded PSH, will maintain evidence of implementing these priorities. Evidence of following these orders of priority may be demonstrated by:

A. Evidence of Severe Service Needs. Evidence of severe service needs is that by which the recipient is able to determine the severity of needs as defined in this section of the Written Standards using data- driven methods such as an administrative data match or through the use of a standardized assessment. The documentation should include any information pertinent to how the determination was made, such as notes associated with case-conferencing decisions.

B. Evidence that the Recipient is Following the CoC's Written Standards for Prioritizing Assistance. Recipients must follow the CoC's written standards for prioritizing assistance, as adopted by the CoC. In accordance with the CoC's adoption of written standards for prioritizing assistance, recipients must in turn document that the CoC's revised written standards have been incorporated into the recipient's intake procedures and that the recipient is following its intake procedures when accepting new project participants into the project.

C. Evidence that there are no Households Meeting Higher Order of Priority within CoC's Geographic Area.

(a) When dedicated and prioritized PSH is used to serve non-chronically homeless households, the recipient of CoC Program-funded PSH should document how it was determined that there were no chronically homeless households identified for assistance within the CoC's geographic area – or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area – at the point in which a vacancy became available. This documentation should include evidence of the outreach efforts that had been undertaken to locate eligible chronically homeless households within the defined geographic area and, where chronically homeless households have been identified but have not yet accepted assistance, the documentation should specify the number of persons that are chronically homeless that meet this condition and the attempts that have been made to engage the individual or family. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence.

(b) When non-dedicated and non-prioritized PSH is used to serve an eligible individual or family that meets a lower order of priority, the recipient of CoC Program-funded PSH should document how the determination was made that there were no eligible individuals or families within the CoC's geographic area - or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area - that met a higher priority. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence that there were no households identified within the CoC's geographic area that meet a higher order of priority.

(c) Documentation for DedicatedPLUS Projects: Recipients of DedicatedPLUS PSH projects must maintain records to document efforts to locate persons meeting the eligibility criteria in Section III.C.2.g of the FY 2019 CoC Program NOFA. Ideally, the CoC should have comprehensive and high- quality data on all households that are currently presenting for assistance within the CoC that is informed by a comprehensive outreach strategy. To justify serving a non-eligible household, a recipient of DedicatedPLUS projects must have documentation from the CoC that demonstrates that outreach is occurring regularly and that the CoC is making reasonable efforts to locate and identify all persons experiencing homelessness within the community.

Appendix VII: Recordkeeping Requirements Documenting “Chronic Homelessness”

RECORDKEEPING REQUIREMENTS TO DOCUMENT CHRONIC HOMELESSNESS	Documenting time spent living in a place not meant for human habitation, an emergency shelter, or a safe haven	<ul style="list-style-type: none"> a. Third party verification (HMIS print-out, written observation by an outreach worker of the conditions where the individual was living, or written referral/certification by another housing or service provider) should be obtained for at least 9 of the required 12 month homeless period; b. Up to 3 months of homelessness may be documented through self-certification; c. A single encounter with a service provider in a month is sufficient to consider the household homeless for the entire month unless there is evidence of a break; d. If third party documentation cannot be obtained, a written record of the intake worker’s due diligence to obtain it, the worker’s documentation of the living situation, and the individual’s self-certification may suffice; e. Up to 25% of the participants served during the project’s operating year may self-certify for the full 12 months but this should be limited to rare and extreme cases and the intake worker must document their due diligence in obtaining other documentation and why it was not received.
	Documenting time spent in institutions	<ul style="list-style-type: none"> a. Discharge paperwork or written or oral referral from a social worker, case manager, or other appropriate official stating the beginning and ending dates of the individual’s stay in the facility; OR b. Where third party verification is not attainable, the written record of the intake worker’s due diligence to obtain it and the individual’s self-certification that he or she is exiting an institutional care facility where they resided less than 90 days.
	Documenting breaks in homelessness	<ul style="list-style-type: none"> a. Third party verification; OR b. Self-reporting by the individual seeking assistance. It is acceptable for all breaks to be documented through self-reporting.
	Documenting the existence of a disability	<p>This must be third party, and includes:</p> <ul style="list-style-type: none"> a. Written verification from a professional licensed by the State to diagnose and treat the disability and certification that the disability expected to be long- continuing or of indefinite duration and substantially impedes the individual’s ability to live independently; OR b. Written verification from SSA; OR c. The receipt of a disability check; OR d. Intake staff recorded observation of a disability that is confirmed and accompanied by evidence outlined in a-c above within 45 days.

Recipients and subrecipients of CoC Program funds are required to maintain and follow written intake procedures to ensure compliance with the “chronically homeless” definition as described in the final rule at: <https://www.hudexchange.info/resource/4847/hearth-defining-chronically-homeless-final-rule/>



U.S. Department of Housing and Urban Development
Office of Community Planning and Development

1

Special Attention of:

All Secretary's Representatives

Issued:

All Regional Directors for CPD

Expires:

All CPD Division Directors

Continuums of Care (CoC)

Recipients of the Continuum of Care (CoC) Program

Issued: July 25, 2016

Expires: This Notice is effective until it is amended, superseded, or rescinded

Cross Reference: 24 CFR Parts 578 and 42 U.S.C. 11381, *et seq.*

Subject: Notice on Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons in Permanent Supportive Housing

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I. Purpose

This Notice supersedes Notice CPD-14-012 and provides guidance to Continuums of Care (CoC) and recipients of Continuum of Care (CoC) Program (24 CFR part 578) funding for permanent supportive housing (PSH) regarding the order in which eligible households should be served in all CoC Program-funded PSH. This Notice reflects the new definition of chronically homeless as defined in CoC Program interim rule as amended by the Final Rule on Defining “Chronically Homeless” (herein referred to as the Definition of Chronically Homeless final rule) and updates the orders of priority that were established under the prior Notice. CoCs that previously adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the FY2015 CoC Program Competition are encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. CoCs that have not previously adopted the orders of priority established in Notice CPD- 14-012 are also encouraged to incorporate the orders of priority included in this Notice into their written standards

A. Background

In June 2010, the Obama Administration released *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness (Opening Doors)*, in which HUD and its federal partners set goals to end Veteran and chronic homelessness by 2015, and end family and youth homelessness by 2020. Although progress has been made there is still a long way to go. In 2015, the United States Interagency Council on Homelessness extended the goal timeline for achieving the goal of ending chronic homelessness nationally from 2015 to 2017. In 2015, there were still 83,170 individuals and 13,105 persons in families with children that were identified as chronically homeless in the United States. To end chronic homelessness, it is critical that CoCs ensure that limited resources awarded through the CoC Program Competition are being used in the most effective manner and that households that are most in need of assistance are being prioritized.

Since 2005, HUD has encouraged CoCs to create new PSH dedicated for use by persons experiencing chronic homelessness (herein referred to as dedicated PSH). As a result, the number of dedicated PSH beds funded through the CoC Program for persons experiencing chronic homelessness has increased from 24,760 in 2007 to 59,329 in 2015. This increase has contributed to a 30.6 percent decrease in the number of chronically homeless persons reported in the Point-in-Time Count between 2007 and 2015. Despite the overall increase in the number of dedicated PSH beds, this only represents 31.6 percent of all CoC Program- funded PSH beds.

To ensure that all PSH beds funded through the CoC Program are used as strategically and effectively as possible, PSH needs to be targeted to serve persons with the highest needs and greatest

barriers towards obtaining and maintaining housing on their own—persons experiencing chronic homelessness. HUD’s experience has shown that many communities and recipients of CoC Program-funded PSH continue to serve persons on a “first-come, first-serve” basis or based on tenant selection processes that screen-in those who are most likely to succeed while screening out those with the highest level of need. These approaches to tenant

4 selection have not been effective in reducing chronic homelessness, despite the increase in the number of PSH beds nationally.

B. Goals of this Notice

The overarching goal of this Notice is to ensure that those individuals and families who have spent the longest time in places not meant for human habitation, in emergency shelters, or in safe havens and who have the most severe service needs within a community are prioritized for PSH. By ensuring that persons with the longest histories of homelessness and most severe service needs are prioritized for PSH, progress towards the Obama Administration’s goal of ending chronic homelessness will increase. In order to guide CoCs in ensuring that all CoC Program-funded PSH beds are used most effectively, this Notice revises the orders of priority related to how persons should be selected for PSH as previously established in Notice CPD-14-012 to reflect the changes to the definition of chronically homeless as defined in the Definition of Chronically Homeless final rule. CoCs are strongly encouraged to adopt and incorporate them into the CoC’s written standards and coordinated entry process.

HUD seeks to achieve two goals through this Notice:

1. Establish a recommended order of priority for dedicated and prioritized PSH which CoCs are encouraged to adopt in order to ensure that those persons with the longest histories residing in places not meant for human habitation, in emergency shelters, and in safe havens and with the most severe service needs are given first priority.
2. Establish a recommended order of priority for PSH that is not dedicated or prioritized for chronic homelessness in order to ensure that those persons who do not yet meet the definition of chronic homelessness but have the longest histories of homelessness and the most severe service needs, and are therefore the most at risk of becoming chronically homeless, are prioritized.

C. Applicability

The guidance in this Notice is provided to all CoCs and all recipients and subrecipients of CoC Program funds—the latter two groups referred to collectively as recipients of CoC Program-funded PSH. CoCs are strongly encouraged to incorporate the order of priority described in this Notice into their written standards, which CoCs are required to develop per 24 CFR 578.7(a)(9), for their CoC Program-funded PSH. Recipients of CoC Program funds are required to follow the written standards for prioritizing assistance established by the CoC (see 24 CFR 578.23(c)(10)); therefore, if the CoC adopts these recommended orders of priority for their PSH, all recipients of CoC Program-funded PSH will be required to follow them as required by their grant agreement. CoCs that adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the most recent CoC Program Competition are strongly encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. Lastly, where a CoC has chosen to not adopt

HUD's recommended orders of priority into their written standards, recipients of CoC Program-funded PSH are encouraged to follow these standards for selecting participants into their programs as long as it is not inconsistent with the CoC's written standards.

D. Key Terms

1. **Housing First.** A model of housing assistance that prioritizes rapid placement and stabilization in permanent housing that does not have service participation requirements or preconditions for entry (such as sobriety or a minimum income threshold). HUD encourages all recipients of CoC Program-funded PSH to follow a Housing First approach to the maximum extent practicable.
2. **Chronically Homeless.** The definition of “chronically homeless”, as stated in Definition of Chronically Homeless final rule is:
 - (a) A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - i. lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - ii. Has been homeless and living as described in paragraph (a)(i) continuously for at least 12 months or on at least four separate occasions in the last 3 years, as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living as described in paragraph (a)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering an institutional care facility;
 - (b) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (a) of this definition, before entering the facility;
 - (c) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (a) or (b) of this definition (as described in Section I.D.2.(a) of this Notice), including a family whose composition has fluctuated while the head of household has been homeless.
3. **Severity of Service Needs.** This Notice refers to persons who have been identified as having the most severe service needs.
 - (a) For the purposes of this Notice, this means an individual for whom at least one of the following is true:

- i. History of high utilization of crisis services, which include but are not limited to, emergency rooms, jails, and psychiatric facilities; and/or
- ii. Significant health or behavioral health challenges, substance use disorders, or functional impairments which require a significant level of support in order to maintain permanent housing.
- iii. For youth and victims of domestic violence, high risk of continued trauma or high risk of harm or exposure to very dangerous living situations.
- iv. When applicable CoCs and recipients of CoC Program-funded PSH may use an alternate criteria used by Medicaid departments to identify high-need, high cost beneficiaries.

(b) Severe service needs as defined in paragraphs i.-iv. above should be identified and verified through data-driven methods such as an administrative data match or through the use of a standardized assessment tool and process and should be documented in a program participant's case file. The determination must not be based on a specific diagnosis or disability type, but only on the severity of needs of the individual. The determination cannot be made based on any factors that would result in a violation of any nondiscrimination and equal opportunity requirements, see 24 C.F.R. § 5.105(a).

II. Dedication and Prioritization of Permanent Supportive Housing Strategies to Increase Number of PSH Beds Available for Chronically Homeless Persons

A. Increase the number of CoC Program-funded PSH beds that are dedicated to persons experiencing chronic homelessness.

Dedicated PSH beds are those which are required through the project's grant agreement to only be used to house persons experiencing chronic homelessness unless there are no persons within the CoC that meet that criteria. If there are no persons within the CoC's geographic area that meet the definition of chronically homeless at a point in which a dedicated PSH bed is vacant, the recipient may then follow the order of priority for non-dedicated PSH established in this Notice, if it has been adopted into the CoC's written standards. The bed will continue to be a dedicated bed, however, so when that bed becomes vacant again it must be used to house a chronically homeless person unless there are still no persons who meet that criterion within the CoC's geographic area at that time. These PSH beds are also reported as "CH Beds" on a CoC's Housing Inventory Count (HIC).

B. Prioritize non-dedicated PSH beds for use by persons experiencing chronic homelessness.

Prioritization means implementing an admissions preference for chronically homeless persons for CoC Program-funded PSH beds. During the CoC Program competition project applicants for CoC Program-funded PSH indicate the number of non-dedicated beds that will be prioritized for use by persons experiencing chronic

homelessness during the operating year of that grant, when awarded. These projects are then required to prioritize chronically homeless persons in their non-dedicated CoC Program-funded PSH beds for the applicable operating year as the project application is incorporated into the grant agreement. All recipients of non-dedicated CoC Program-funded PSH are encouraged to change the designation of their PSH to dedicated, however, at a minimum are encouraged to prioritize the chronically homeless as beds become vacant to the maximum extent practicable, until there are no persons within the CoC's geographic area who meet that criteria. Projects located in CoCs where a sub-CoC approach to housing and service delivery has been implemented, which may also be reflected in a sub-CoC coordinated entry process, need only to prioritize assistance within their specified area.

For example, if a OH-501 Toledo/Lucas County CoC has chosen to divide the CoC into six distinct regions for purposes of planning and housing and service delivery, each region would only be expected to prioritize assistance within its specified geographic area.¹

The number of non-dedicated beds designated as being prioritized for the chronically homeless may be increased at any time during the operating year and may occur without an amendment to the grant agreement.

III. Order of Priority in CoC Program-funded Permanent Supportive Housing

The definition of chronically homeless included in the final rule on “Defining Chronically Homeless”, which was published on December 4, 2015 and went into effect on January 15, 2016, requires an individual or head of household to have a disability and to have been living in a place not meant for human habitation, in an emergency shelter, or in a safe haven for at least 12 months either continuously or cumulatively over a period of at least 4 occasions in the last 3 years. HUD encourages all CoCs adopt into their written standards the following orders of priority for all CoC Program-funded PSH. CoCs that adopted the orders of priority established in Notice CPD-14-012, which this Notice supersedes, and who received points for having done so in the most recent CoC Program Competition are strongly encouraged to update their written standards to reflect the updates to the orders of priority as established in this Notice. Where a CoC has chosen to not incorporate HUD's recommended orders of priority into their written standards, recipients of CoC Program-funded PSH are encouraged to follow these standards for selecting participants into their programs as long as it is not inconsistent with the CoC's written standards.

As a reminder, recipients of CoC Program-funded PSH are required to prioritize otherwise eligible households in a nondiscriminatory manner. Program implementation, including any prioritization policies, must be implemented consistent with the nondiscrimination provisions of the Federal civil rights laws, including, but not limited to the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Title II or III of the Americans with Disabilities Act, as applicable. For example, while it is acceptable to prioritize based on level of need for the type of assistance being offered, prioritizing based on specific disabilities would not be consistent with fair housing requirements or program regulations.

A. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Dedicated or Prioritized for Occupancy by Persons Experiencing Chronic Homelessness

1. CoCs are strongly encouraged to revise their written standards to include an order of priority, determined by the CoC, for CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness that is based on the length of time in which an individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter and the severity of the individual's or family's service needs. Recipients of CoC Program-funded PSH that is dedicated or prioritized for persons experiencing chronic homelessness would be required to follow that order of priority when selecting participants for housing, in a manner consistent with their current grant agreement.
2. Where there are no chronically homeless individuals and families within the CoC's geographic area, CoCs and recipients of CoC Program-funded PSH are encouraged to follow the order of priority in Section III.B. of this Notice. For projects located in CoC's where a sub-CoC approach to housing and service delivery has been implemented, which may also be reflected in a sub-CoC coordinated entry process, need only to prioritize assistance within their specified sub-CoC area.²
3. Recipients of CoC Program-funded PSH should follow the order of priority above while also considering the goals and any identified target populations served by the project. For example, a CoC Program-funded PSH project that is permitted to target homeless persons with a serious mental illness should follow the order of priority under Section III.A.1. of this Notice to the extent in which persons with serious mental illness meet the criteria. In this example, if there were no persons with a serious mental illness that also met the criteria of chronically homeless within the CoC's geographic area, the recipient should follow the order of priority under Section III.B for persons with a serious mental illness.
4. Recipients must exercise due diligence when conducting outreach and assessment to ensure that chronically homeless individuals and families are prioritized for assistance based on their total length of time homeless and/or the severity of their needs. HUD recognizes that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing and recipients of CoC Program-funded PSH are not required to allow units to remain vacant indefinitely while waiting for an identified chronically homeless person to accept an offer of PSH. CoC Program-funded PSH providers are encouraged to follow a Housing First approach to the maximum extent practicable. Therefore, a person experiencing chronic homelessness should not be forced to refuse an offer of PSH if they do not want to participate in the project's services, nor should a PSH project have eligibility criteria or preconditions to entry that systematically exclude those with severe service needs. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these chronically homeless persons must continue to be prioritized for PSH until they are housed.

B. Prioritizing Chronically Homeless Persons in CoC Program-funded Permanent Supportive Housing Beds Not Dedicated or Not Prioritized for Occupancy by Persons Experiencing Chronic Homelessness

- 1. CoCs are strongly encouraged to revise their written standards to include the following order of priority for non-dedicated and non-prioritized PSH beds. If adopted into the CoCs written standards, recipients of CoC Program-funded PSH that is not dedicated or prioritized for the chronically homeless would be required to follow this order of priority when selecting participants for housing, in a manner consistent with their current grant agreement.**

(a) First Priority—Homeless Individuals and Families with a Disability with Long Periods of Episodic Homelessness and Severe Service Needs

An individual or family that is eligible for CoC Program-funded PSH who has experienced fewer than four occasions where they have been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter but where the cumulative time homeless is at least 12 months **and** has been identified as having severe service needs.

(b) Second Priority—Homeless Individuals and Families with a Disability with Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or in an emergency shelter and has been identified as having severe service needs. The length of time in which households have been homeless should also be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

(c) Third Priority—Homeless Individuals and Families with a Disability Coming from Places Not Meant for Human Habitation, Safe Haven, or Emergency Shelter Without Severe Service Needs.

An individual or family that is eligible for CoC Program-funded PSH who is residing in a place not meant for human habitation, a safe haven, or an emergency shelter where the individual or family has not been identified as having severe service needs. The length of time in which households have been homeless should be considered when prioritizing households that meet this order of priority, but there is not a minimum length of time required.

(d) Fourth Priority—Homeless Individuals and Families with a Disability Coming from Transitional Housing.

An individual or family that is eligible for CoC Program-funded PSH who is currently residing in a transitional housing project, where prior to residing in the transitional housing had lived in a place not meant for human habitation, in an

emergency shelter, or safe haven. This priority also includes individuals and families residing in transitional housing who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and prior to residing in that transitional housing project even if they did not live in a place not meant for human habitation, an emergency shelter, or a safe haven prior to entry in the transitional housing.

2. Recipients of CoC Program-funded PSH should follow the order of priority above, as adopted by the CoC, while also considering the goals and any identified target populations served by the project. For example, non-dedicated or non-prioritized CoC Program-funded PSH that is permitted to target youth experiencing homelessness should follow the order of priority under Section III.B.1. of this Notice, as adopted by the CoC, to the extent in which youth meet the stated criteria.
3. Recipients must exercise due diligence when conducting outreach and assessment to ensure that persons are prioritized for assistance based on their length of time homeless and the severity of their needs following the order of priority described in this Notice, and as adopted by the CoC. HUD recognizes that some persons—particularly those living on the streets or in places not meant for human habitation—might require significant engagement and contacts prior to their entering housing and recipients are not required to keep units vacant indefinitely while waiting for an identified eligible individual or family to accept an offer of PSH (see [FAQ 1895](#)). Recipients of CoC Program-funded PSH are encouraged to follow a Housing First approach to the maximum extent practicable. Street outreach providers should continue to make attempts to engage those persons that have been resistant to accepting an offer of PSH and where the CoC has adopted these orders of priority into their written standards, these individuals and families must continue to be prioritized until they are housed.

IV. Using Coordinated Entry and a Standardized Assessment Process to Determine Eligibility and Establish a Prioritized Waiting List

A. Coordinated Entry Requirement

Provisions at 24 CFR 578.7(a)(8) requires that each CoC, in consultation with recipients of Emergency Solutions Grants (ESG) program funds within the CoC's geographic area, establish and operate either a centralized or coordinated assessment system (referred to in this Notice as coordinated entry or coordinated entry process) that provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. CoCs that adopt the order of priority in Section III of this Notice into the CoC's written standards are strongly encouraged to use a coordinated entry process to ensure that there is a single prioritized list for all CoC Program-funded PSH within the CoC. The [Coordinated Entry Policy Brief](#), provides recommended criteria for a quality coordinated entry process and standardized assessment tool and process. Under no circumstances shall the order of priority be based upon diagnosis or disability type, but instead on the length of time an individual or family has been experiencing homelessness and the severity of needs of an individual or family.

B. Written Standards for Creation of a Single Prioritized List for PSH

CoCs are also encouraged to include in their policies and procedures governing their coordinated entry system a requirement that all CoC Program-funded PSH accept referrals only through a single prioritized list that is created through the CoCs coordinated entry process, which should also be informed by the CoCs street outreach. Adopting this into the CoC's policies and procedures for coordinated entry would further ensure that CoC Program-funded PSH is being used most effectively, which is one of the goals in this Notice. The single prioritized list should be updated frequently to reflect the most up-to-date and real-time data as possible.

C. Standardized Assessment Tool Requirement

CoCs must utilize a standardized assessment tool, in accordance with 24 CFR 578.3, or process. The [Coordinated Entry Policy Brief](#), provides recommended criteria for a quality coordinated entry process and standardized assessment tool.

D. Nondiscrimination Requirements

CoCs and recipients of CoC Program-funded PSH must continue to comply with the nondiscrimination provisions of Federal civil rights laws, including, but not limited to, the Fair Housing Act, Section 504 of the Rehabilitation Act, Title VI of the Civil Rights Act, and Titles II or III of the Americans with Disabilities Act, as applicable. See 24 C.F.R. § 5.105(a).

V. Recordkeeping Recommendations for CoCs that have Adopted the Orders of Priority in this Notice

24 CFR 578.103(a)(4) outlines documentation requirements for all recipients of dedicated and non-dedicated CoC Program-funded PSH associated with determining whether or not an individual or family is chronically homeless for the purposes of eligibility. In addition to those requirements, HUD expects that where CoCs have adopted the orders of priority in Section III. of this Notice into their written standards. The CoC, as well as recipients of CoC Program-funded PSH, will maintain evidence of implementing these priorities. Evidence of following these orders of priority may be demonstrated by:

- A. Evidence of Severe Service Needs.** Evidence of severe service needs is that by which the recipient is able to determine the severity of needs as defined in Section I.D.3. of this Notice using data-driven methods such as an administrative data match or through the use of a standardized assessment. The documentation should include any information pertinent to how the determination was made, such as notes associated with case-conferencing decisions.
- B. Evidence that the Recipient is Following the CoC's Written Standards for Prioritizing Assistance.** Recipients must follow the CoC's written standards for prioritizing assistance, as adopted by the CoC. In accordance with the CoC's adoption of written standards for prioritizing assistance, recipients must in turn document that the CoC's revised written standards have been incorporated into the recipient's intake procedures and that the recipient is following its intake procedures when accepting new program participants into the project.

C. Evidence that there are no Households Meeting Higher Order of Priority within CoC's Geographic Area.

- (a) When dedicated and prioritized PSH is used to serve non-chronically homeless households, the recipient of CoC Program-funded PSH should document how it was determined that there were no chronically homeless households identified for assistance within the CoC's geographic area – or for those CoCs that implement a sub-CoC³ planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area – at the point in which a vacancy became available. This documentation should include evidence of the outreach efforts that had been undertaken to locate eligible chronically homeless households within the defined geographic area and, where chronically homeless households have been identified but have not yet accepted assistance, the documentation should specify the number of persons that are chronically homeless that meet this condition and the attempts that have been made to engage the individual or family. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence.
- (b) When non-dedicated and non-prioritized PSH is used to serve an eligible individual or family that meets a lower order of priority, the recipient of CoC Program-funded PSH should document how the determination was made that there were no eligible individuals or families within the CoC's geographic area - or for those CoCs that implement a sub-CoC planning and housing and service delivery approach, the smaller defined geographic area within the CoC's geographic area - that met a higher priority. Where a CoC is using a single prioritized list, the recipient of PSH may refer to that list as evidence that there were no households identified within the CoC's geographic area that meet a higher order of priority.

VI. Questions Regarding this Notice

Questions regarding this notice should be submitted to HUD Exchange Ask A Question (AAQ) Portal at: <https://www.hudexchange.info/get-assistance/my-question/>.

³ For the State of Louisiana grant originally awarded pursuant to “Department of Housing and Urban Development— Permanent Supportive Housing” in chapter 6 of title III of the Supplemental Appropriations Act, 2008 (Public Law 110–252; 122 Stat. 2351), projects located within the geographic area of a CoC that is not the CoC through which the State is awarded the grant may prioritize assistance within that geographic area instead of within the geographic area of the CoC through which the State is awarded the grant.

Toledo Lucas County Continuum of Care: Coordinated Entry Referral Process

Prepared by:

Carl Sutherland, HMIS Administrator, Toledo Lucas County Homelessness Board

Referral Components

The referral process begins with Coordinated Entry and continues with the TLCHB Homelessness Board (TLCHB) making a referral to a housing program for assistance. There are numerous components to the CoC's housing referral process that occur within TLCHB.

The following is an overview that provides the referral components. Additional details can be found in the subsequent sections of this manual.

1. Initial Contact
2. Determining Eligibility
3. Program Eligibility & Level of Assistance
4. Participating Project List
5. Referral Approach
6. Referral Communications & Tracking
7. Rejection Protocol
8. Referral Process for DV Victims
9. Referral Process for Veterans
10. Referral Process for Unaccompanied Youth

Initial Contact

Coordinated Entry: serving as the single, centralized point for access/entry

- 2-1-1 United Way
 - a. Individual calls 2-1-1: they can call 24 hours a day.
 - b. Community Navigation Specialist (CNS) assesses adult only household/households with children, determining their eligibility for shelter.
 - i. If eligible, CNS will conduct the necessary pre-screen, and send information to CE. For this, the Refer database is utilized.

- ii. If ineligible, CNS makes any other appropriate referrals.
- c. CNS verbally confirms family is stable for the night.
 - i. If so, they are told that CE will contact them within 1 business day.
 - ii. If not, a 2-1-1 supervisor is contacted, and subsequently contacts the CE staff on call. If it is an adult only household, outside shelters are given, and CE staff contacts the client back as soon as possible.
- d. When CE is given the information, CNS then transfers their information onto HMIS
- e. A call is then made to the client in order to complete housing crisis assessment and explain shelter process
 - i. If permission was previously given, CE staff will leave a message explaining the process.
 - ii. If CE staff is able to speak with client, assessment is completed, and CE gives any other referrals clients may need.
 - iii. If CE staff is unable to leave message, a follow-up is scheduled, and the client is contacted 3 times.
 - iv. Clients remain on list, until they either have refused shelter, or CE staff has attempted contact twice after housing crisis assessment has been completed.

Determining Eligibility

In TLCHB, one of the tools that the CoC uses to determine level of housing assistance is the SPDAT. The SPDAT/housing assessment is completed with the person in a housing crisis.

- *The Service Prioritization Decision Assistance Tool (SPDAT)*
Housed within all of participating shelters, as well as most of the Community Mental Health Centers, are Re-Housing Specialists. These specialized case managers are trained in the variations between Housing Programs within the community as well as the SPDAT.

The SPDAT (for individuals) takes into account 15 different domains. The Family SPDAT (F-SPDAT) takes into account 20 domains to determine the family's housing acuity. The SPDAT/F-SPDAT prioritize both housing type as well as housing priority. This tool provides an evidence based assessment of the client's housing preparedness. TLCHB

also considers the amount of time spent in shelter or on the streets within the referral process; this ensures the community minimizes the duration of homelessness.

Re-Housing Specialists utilize other case management expertise, case file documentation, and in depth interviewing techniques to complete the SPDAT or the F-SPDAT.

From the various remote access points for SPDAT re-housing assessments, all community SPDAT numbers and information are given to the TLCHB's Communication & Data Specialist to be compiled into a Community SPDAT list. Referrals to appropriate housing programs are coordinated from this list.

- *Community SPDAT List*

The Community SPDAT List is another tool that is used to determine client eligibility. The TLCHB Communication & Data Specialist is responsible for monitoring and maintaining the Community SPDAT Lists. The entries on the Community SPDAT List represent those individual/families who have obtained their required re-housing documents, completed a SPDAT, and are currently homeless. The entries contain the head of household's HMIS number, the SPDAT score, the date the SPDAT was completed, and the number of weeks on the Community SPDAT List.

The Community SPDAT List is distributed to all shelters, Community Mental Health Center, housing programs, CE staff, and outreach workers who have been SPDAT trained. This allows them to track their clients. When a person is referred to a housing program, the TLCHB Communication & Data Specialist documents the referral on spreadsheet and includes which agency and program the person is referred to. The TLCHB Communication & Data Specialist maintains two spreadsheets; 1) the referral spreadsheet which includes agency and recommend programs; 2) spreadsheet of all SPDAT Lists.

Referral Approach

The TLCHB CoC uses a cohesive referral approach. When a referral is made, an email is sent to all parties involved which allows each agency to see what other case managers and supports the referral may have. Case conferences occur frequently to ensure a warm handoff.

Case conferences should include every agency the referral is receiving services from. Examples may include the referring agency, the receiving agency, Children's Services, TLCHB, Community Mental Health Centers, etc. Utilizing case conferences allows all agencies to identify and discuss the referral's barriers and ultimately serve the person more efficiently.

Housing Program Eligibility & Level of Assistance

Within the TLCHB CoC, there is a range of housing programs available to persons experiencing homelessness. The programs range from offering short-term assistance to long-term assistance. The TLCHB CoC honors the referral's choice regarding a specific agency or program type, whenever possible. The TLCHB Communication & Data Specialist is advised when a referral requests alternate placement or program. Each program has eligibility requirements and provides a different level of assistance. Below are the eligibility requirements for each housing program:

- ***Short-Term Rapid Re-Housing:***
 - a. Currently homeless
 - b. Obtained all required re-housing documents
 - c. Completed SPDAT
 - d. SPDAT score between 20-34 for single adults; 35-60 for families
- ***Medium-Term Rapid Re-Housing:***
 - a. Currently homeless
 - b. Families only
 - c. Obtained all required re-housing documents
 - d. Completed SPDAT
 - e. SPDAT score in the higher RRH range
 - f. Cannot re-enter medium-term RRH for 9 months after exiting medium RRH
- ***Tenant-Based Rental Assistance (TBRA):***
 - a. TBRA is still considered a form of RRH
 - b. Currently homeless
 - c. Obtained all required re-housing documents
 - d. Completed SPDAT

- e. SPDAT score on the higher end of the RRH range
- f. Cannot have been in the TBRA program previously
- *Permanent Supportive Housing (PSH):*
 - a. Currently homeless
 - b. Obtained all required re-housing documents
 - c. Completed SPDAT
 - d. SPDAT score between 35-60 for singles; 54-80 for families
 - e. Have a disability documented on a housing impairment form

Below are the services provided by each type of program:

- *Short-Term Rapid Re-Housing (RRH):*
 - a. Security deposit
 - b. Outstanding utility debt (up to 6 months)
 - c. \$2,400.00 stipend for rent
 - d. Ongoing case management and wrap around services
- *Medium-Term Rapid Re-Housing (RRH):*
 - a. Security Deposit
 - b. Up to 12 months of rental assistance
 - c. Up to 6 months of past utility debt
 - d. Ongoing case management and wrap around services
- *Tenant-Based Rental Assistance (TBRA):*
 - a. Security deposit
 - b. Utility deposits (for gas and electric)
 - c. 12 months of rental assistance
 - d. Utility allowance when housed
 - e. Ongoing case management and wrap around services
- *Permanent Supportive Housing (PSH):*
 - a. Security deposit
 - b. Outstanding utility debt (up to 6 months)
 - c. 12 months or more of rental assistance
 - d. Ongoing case management and wrap around services

Disclosure: The Coordinated Entry Process complies with the non-discrimination requirements of the Fair Housing Act, which prohibits discrimination in all housing transactions on the basis of race, national origin, sex, color, religion, disability status and familial status. This also includes protection from housing discrimination based on source of income. Additional protected classes under state law include sexual orientation (including gender identity), marital status, military

discharge status, age (40+). Agencies cannot preference any protected class unless allowed by statute/regulation, or written waiver from their funding or regulatory body (i.e. U.S. Department of Housing and Urban Development).

All Authorized User Agencies who enter into an MOU for the Coordinated Entry Process agree to take full accountability for complying with Fair Housing and all other funding and program requirements. The MOU requires User Agencies to use the Coordinated Entry Process in a consistent manner with the statutes and regulations that govern their housing programs.

The TLCHB CoC will request from each Authorized User Agency their tenant selection plan and any funding contract that requires or allows a specific subpopulation of persons to be served. For instance, Housing Opportunities for Persons with AIDS (HOPWA) programs will show funding contract, or a single-gender program must produce its HUD waiver. The TLCHB CoC in accordance with the Fair Housing Act also recognizes that a housing provider may seek to fulfill its “business necessity” by narrowing focus on a subpopulation within the homeless population. The Coordinated Entry Process may allow filtered searches for subpopulations while preventing discrimination against protected classes.

Participating Project List

It is critical to determine housing program availability before making a referral. TLCHB’s Communication & Data Specialist is responsible for monitoring housing program availability.

The TLCHB Communication & Data Specialist communicates weekly with the multiple housing programs to inquire about availability.

After the housing programs have communicated the availability for the week, the TLCHB Communications & Data Specialist enters that information into a spreadsheet. This spreadsheet includes the number of openings each week, the program type (RRH, TBRA or PSH) and the individual projects and any additional eligibility requirements.

A separate spreadsheet is created that has all of the Community SPDAT Lists that have been distributed complete with referral information.

Referral Communication & Monitoring

Referral Communication

After eligibility has been determined the TLCHB Communication & Data Specialist verifies that the person has all necessary documents and the SPDAT score. Then, when an opening has been identified, the TLCHB Communication & Data Specialist informs all parties involved of the referral. This is done via email as all parties can keep electronic records.

The referral email contains the following information:

- The referral date and time
- The person (identified by an HMIS number for confidentiality)
- The program type the person is being referred for
- Any relevant information or disabilities (family size, wheel chair access, etc.)
- A timeframe for the referral agency to contact the person
- How to locate the person's required documents and SPDAT

The referral email is sent from the TLCHB Communication & Data Specialist to the following parties:

- The agency currently serving the person (shelter and/or mental health provider)
- The agency receiving the referral
- The Coordinated Entry Specialist

When the referral agency receives the referral, they are given access to the client's documents and SPDAT score to verify eligibility.

Referral Monitoring

The TLCHB CoC has the ability to monitor referral progress. The TLCHB Communication & Data Specialist using electronic documentation and the HMIS data system monitors the referrals.

When a referral is made, the TLCHB Communication & Data Specialist sends an email notifying all parties of the referral. In that email there is a timeframe by which the receiving agency must contact the client, generally it is a 7-10 day timeframe. After the receiving agency completes an intake with the person, an entry is made in the HMIS data system. Additionally, there is an option in HMIS for the referral agency and the receiving agency to leave case notes documenting progress.

After 10 days the TLCHB Communication & Data Specialist will verify that the person's documents were shared correctly and check for an entry in HMIS. If the documents have been shared and there has been confirmation that the person has not been contacted the TLCHB Communication & Data Specialist will contact the receiving agency to inquire about the status of the referral. If the receiving agency is unable to take the referral, an alternative referral is identified. If the receiving agency is unable to locate a person after 7-10 days the case will be closed. The person will have the opportunity for another referral if they present as homeless again in the future.

Referral Rejection Protocol

Receiving Agency

In the TLCHB CoC, receiving agencies are permitted to reject a referral if the referral violates the agency's program policies. If a referral is rejected the person, the agency serving the person and the TLCHB Communication & Data Specialist is notified in writing of the rejection and the rationale. A rejection letter also contains that agency's grievance procedure. The person has the right to file a grievance and go through the grievance procedure within that agency. If the person wishes to escalate the grievance it is brought to either TLCHB's Executive Director or Grants Administrator.

If a solution cannot be reached and the person is still in need of housing assistance, the TLCHB Communication & Data Specialist makes every effort to identify an alternate referral agency.

Client

As mentioned previously, the TLCHB CoC does adhere to a person's choice when it comes to referrals. At the beginning of the process, the person is made aware of what program types are available for them and the eligibility requirements associated with each one. If the person has a preference for program type or agency and the person is eligible for that program or agency, the TLCHB CoC does honor that. If the person has a preference, they are informed that by limiting their referral options they may be prolonging the referral process, however if the person still has a certain preference, the TLCHB CoC honors it.

Referral Process for DV Victims

The TLCHB CoC has a process for serving a person that is fleeing from domestic violence. There are two options, one is used if the client is willing to have their

information entered into the secure HMIS data system, and the other is used if the client refuses to have their information entered into the secure HMIS data system.

Allow Information in HMIS

If a person consent to be entered into the HMIS system, they are given a consent form that they must sign. Then, the process proceeds as it usually does; a SPDAT is completed, the person is placed on the Community SPDAT List, a referral is made and agencies work together to assist the person obtaining housing.

Refuse Information in HMIS

No person is required to be entered into HMIS. If a person does consent to being entered into the HMIS system, they can be entered anonymously without providing any identifying information. In this case, either the DV shelter or the TLCHB Communication & Data Specialist will give the person an ID number, not an HMIS number. The person will have the SPDAT completed and be placed on the Community SPDAT List, using the client ID number.

When a referral is made, the TLCHB Communication & Data Specialist or the agency serving the person will fax the person's documents and SPDAT to the agency receiving the referral. This will only be communicated via fax for security. The person will be identified by the client ID number in any electronic correspondence.

If a case manager enters, a person anonymously in HMIS that case manager is responsible for tracking that person in the system.

If a person has had their information entered into HMIS and then chooses to be anonymous in that system, the HMIS Administrator is contacted to allow that person to be anonymous.

Housing Referrals for DV Victims

The agency receiving the referral is informed if the person is a DV victim or residing in a DV shelter. This allows the receiving agency to prepare a housing plan specific to that person.

Referral Process for Veterans

In order to identify all veterans in the Toledo Lucas County Continuum of Care, the Community Veterans Committee Master List Sub-group will use various sources of relevant data to compile and maintain a Master (by name) list. The following sources of relevant veterans' data have been identified. Sources shall be polled no less than every two weeks:

1. Toledo HMIS (Toledo Lucas County Homelessness Board), including data from Open Door Ministries, NPI Veterans Program (GPD), Beach House, St Pauls' Community Center Shelter & Family House Shelter
2. WSOS Community Action, including data from Outreach Sources i.e., Cherry Street Mission Ministries and Toledo Gospel, & National Church Residences (via ineligible referrals)
3. Veterans Affairs of Ann Arbor, including data from VA referrals to ADAMS House, VASH referrals and all outreach activities.
4. Verification of Permanent Housing Offer forms should be polled.

The Toledo Lucas County Homelessness Board's HMIS administrator will be responsible to maintain the Veterans' Master List. The HMIS Administrator will poll the sources of veteran data no less than every two week and update the Master List accordingly. Once updated the Master List will be securely distributed to members of the Master List Subgroup for the bi-weekly case conferencing meeting.

Not less than every two weeks, all veterans on the Master List will be discussed in the Master List Sub-group with the goal to identify barriers to permanent housing and facilitate solutions to those barriers. The HMIS administrator will lead the Sub-group through the Master list. All parties with relevant data will share updates to the veteran's status. The sub-group will identify next steps to the goal of the veteran's obtaining permanent housing and assign the next steps to a Sub-group member. The HMIS administrator will note all updates, next steps and responsible parties in the Master list.

The Master List Sub-group will report out aggregate statistics and benchmarks regularly. The HMIS Administrator will process the statistics and benchmarks no less than once monthly and report them to the Community Veterans Committee Planning Group. And the Master List Policies and Procedures will be reviewed no less than annually based on case conferencing performance.

Referral Process for Unaccompanied Youth

Currently, there are two processes for serving unaccompanied youth, the determinant being the age of the youth. For those youth between the ages of 18 to 24 years old, these youth are entered into the coordinated entry referral process described on pages 1 to 9. For unaccompanied youth under 18 years old, the youth are referred to Safety Net, a youth shelter for youth from 12 to 17 years old.

Safety Net provides temporary shelter, supportive services and life skills development lessons to youth who have left home without permission of their parents or guardians or to other homeless youth who might otherwise end up in the child welfare, mental health, or juvenile justice systems in Lucas County (Toledo), Ohio. Safety Net is designed to increase youth's safety, social and emotional well-being, self-sufficiency, and to help them build permanent connections with families, communities, schools and other positive social networks.

Youth ages 12-17 may stay (become a resident at Safety Net) if they meet one or more of the following criteria:

1. Youth are experiencing a family crisis to the point where safety, physical health or emotional health is at risk;
2. Youth who have run away;
3. Youth who have been asked to leave their residence;
4. Youth who are homeless or couch hopping from place to place;
5. Youth who are stranded in the area;
6. Youth who are being physically, sexual, or emotionally abuse and need to get help; or
7. Other situations that are a crisis for the resident (i.e. resident is lost, resident's guardians cannot be located, etc.).

Custodial consent is required for minor residents who remain in the Shelter for more than twenty-four hours. Staff will attempt to obtain constant at admission or as soon as possible unless there are reasons to delay contact with guardian.

Referrals may come from a variety of sources. Youth may just appear at Safety Net and will be assessed.

While at Safety Net, the youth will be provided with:

- **Gateway services**, providing food, shelter, clothing, transportation and hygiene-related items;

- **Assessment services and intensive coordinated case management**, ensuring youth receive assistance with emotional and behavioral health challenges while developing a plan for permanency;
- **Continuum service linkages**, ensuring the ability to provide services as a community to the target population; and
- **Follow-up/aftercare services**, providing three months of follow-up services to youth, including a plan to exit, permanent placement and personal goals.

Youth will be screened within their first two days in the shelter by staff; the results of these screens will be used to inform the service planning process, including the need for further assessment. Clinical assessment for behavioral health will be provided by staff within Zepf Center's youth services department.

Shelter staff will collaborate with the youth to develop an exit plan. Part of the exit planning process will be to ask the youth to discuss their plans for either reunification with the parents/ guardian or to consider options for a safe and stable living situation if reunification is not possible. 90 days of follow up/aftercare services will be provided for youth who receive shelter services or are provided alternative living arrangements, regardless of their length of stay in the shelter.

Toledo Lucas County Continuum of Care: Recommendations for Collaborative Governance of Coordinated Assessment

Original Document Prepared by

Terry Biel—Technology Director, Toledo Lucas County Homelessness Board
Mike Badik—Grants Administrator, Toledo Lucas County Homelessness Board

Revisions Prepared by:

Richard Sutherland—HMIS Administrator, Toledo Lucas County Homelessness Board

Background

This document is intended as an addendum to the original Coordinated Assessment recommendations developed through the Housing Collaborative Network and subsequently adopted by the Toledo Lucas County Homelessness Board (TLCHB). The original recommendations left unaddressed the structure by which providers can provide feedback on the quality of referrals from Coordinated Entry, address logistics concerns, and establish standards for participating program types. These are addressed now in this document.

In January 2017, The Department of Housing and Urban Development (HUD) released the **Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System (Notice CPD-17-01)** and the **Coordinated Entry Process Self-Assessment**. Together, these two documents present updated requirements and a method of assessment to evaluate the current functioning of Coordinated Assessment (Coordinated Entry) projects. After reviewing the documents, the Quality and Performance Committee tasked themselves with reviewing and revising the local documents and processes.

Terminology: Coordinated Assessment to Coordinated Entry

While Coordinated Assessment is the terminology used in the statutes, HUD and the other Federal Partners have agreed on another phrase to describe the process: Coordinated Entry. While the terms may be used interchangeably, HUD and the Federal partners will use Coordinated Entry to refer to the projects. TLCHB will align with this change.

Management of Coordinated Entry

The Toledo Lucas County Homelessness Board and its staff are ultimately responsible for the implementation and management of Coordinated Entry for housing crises and homeless services in the Toledo Lucas County Continuum of Care.

Data Management for Coordinated Entry

Coordinated Entry includes significant data and therefore, data management. The Toledo Lucas County Continuum of Care has implemented a Homeless Management Information System (HMIS) to help manage data for persons who are homeless within the continuum. As such, data management for all Coordinated Entry functions will be managed within HMIS, to the extent effective within the HMIS software. Important Coordinated Entry data management functions include: Records of Initial Contact and Assessment; Referrals to Emergency Shelter, Transitional Housing or Safe Haven; Records of Stays in Emergency Shelter, Transitional Housing and Safe Haven; Assessments for Housing Placement; and Referrals to Permanent Housing Options (Rapid ReHousing, Permanent Supportive Housing, or other Permanent Housing services).

Privacy Protections for Coordinated Entry

As an extension of the HMIS, data collected for Coordinated Entry functions will be subject to the Privacy and Security provisions of the **Toledo Homeless Management Information System (HMIS) Consolidated Policies and Procedures**, including annual privacy and security training of all HMIS End users. While all homeless service clients must be entered in HMIS, clients that do not consent to share their Personally Identifiable Information (PII) may be entered anonymously.

Evaluation of Coordinated Entry

In order to maintain an effective and functioning system, the community will periodically evaluate the performance of the Coordinated Entry.

Client Surveys

Client Surveys will be used to evaluate the effectiveness of proximate Coordinated Entry experiences. Surveys will be conducted twice a year and at entry or exit of projects adjacent to the Coordinated Entry Functions, such as 1) at Emergency Shelter/Transitional Housing/Safe Haven Start to evaluate initial contact and assessment and referrals or 2) Emergency Shelter/Transitional Housing/Safe Haven Exit to evaluate assessments of permanent housing placement, or 3) at three (3) months after Permanent Housing Placement to evaluate the assessment of permanent housing placement.

Client Focus Groups

Client Focus Groups will be convened to evaluate the effectiveness of the immediate and ongoing Coordinated Entry experiences. Focus groups will be convened twice a year during project client stays and for all effected project types (e.g., Emergency Shelters and Permanent Supportive Housing).

Service Provider Reports

Service Providers and projects can, at any time, report feedback about Coordinated Entry processes to TLCHB using a Coordinated Entry Report Form.

Service Provider Focus Group

Annually, one Housing Collaborative Network (HCN) meeting will be designated for obtaining feedback from participating organizations/projects regarding the effectiveness of Coordinated Entry.

Feedback Evaluation and Reporting

Feedback from all data collection formats will be given to the TLCHB Quality and Performance Committee (or sub-committee thereof) for evaluation. The Committee will report annually on the functioning and effectiveness of the Coordinated Entry project to the community.

Client Privacy for Feedback

At a minimum, clients will have the opportunity to provide feedback anonymously through both surveys and focus groups, although TLCHB reserves the right to mandate anonymity for all collected client feedback. All client feedback passed to the Quality and Performance Committee (or sub-committee thereof) for the purpose of evaluation will be anonymous.

Quality of Care Workgroups

The Quality of Care groups, as created by previous policies, are discontinued.

Coordinated Assessment Advisory Committee

The Coordinated Assessment Advisory Committee, as created by previous policies, is discontinued.

Document History

Document Prepared by

Terry Biel—Technology Director, Toledo Lucas County Homelessness Board

Mike Badik—Grants Administrator, Toledo Lucas County Homelessness Board

20 February 2013: Presented to HCN by TLCHB staff

27 March 2013: Adopted by TLCHB

Revisions prepared by
Richard Sutherland – HMIS Administrator, Toledo Lucas County Homelessness Board

18 October 2017: Presented to HCN by TLCHB staff
15 November 2017: Amendments approved by TLCHB

Toledo Lucas County Continuum of Care: Recommendations for Centralized Approach to Coordinated Access/Entry

Prepared by:

Original: Terry Biel – Technology Director, Toledo Lucas County Homelessness Board
Revisions: Mike Badik – Executive Director, Toledo Lucas County Homelessness Board

What is a Centralized Approach to Coordinated Access/Entry (Centralized CE Approach)

Under a Centralized CE Approach, households may enter the system in a variety of ways. However, these all ultimately involve connecting households to a single, centralized point to receive the bulk of Screening, Diversion, and Temporary Placement services. In our community, a Centralized CE Approach is the “best fit” for Centralized CE with United Way 2-1-1 center serving as the single, centralized point for access/entry.

Emergency Shelter

Under this model, Emergency Shelters should not simply turn away walk-ins. If walk-ins present, Emergency Shelter staff should provide initial Screening to try to find a brief resolution to the household’s housing crisis. If this initial Screening does not result in a resolution to their housing crisis and the client is not in need of acute crisis services, the shelter assist the presenter to contact 2-1-1.

Phone calls to shelters for request for placement in their emergency shelter should be redirected to 2-1-1 once it has been established that they are not in need of acute crisis services.

Conversely, households determined to be in-need of emergency shelter by Coordinated Access/Entry will be referred to participating shelters. In the case of shelters using ServicePoint, Centralized CE Approach will check for capacity the emergency shelter before making a referral, and confirm availability as needed. The details of this handoff process must be arranged between Centralized CE Approach and the participating shelters collaboratively.

Diversion and Homelessness Prevention

Rapid Re-Housing, Permanent Supportive Housing and Homeless Prevention providers should direct all walk-ins and other inquiries to 2-1-1.

Households determined to be in-need of and eligible for Temporary Placement services will be referred to participating providers by Centralized CE Approach. The details of this handoff process must be arranged between Centralized CE Approach and the participating shelters collaboratively.

The centralized system will make use of a combination of United Way 2-1-1 Community Resource Navigator Specialist staff (CRNS) and two Coordinated Entry (CE) specialists. CRNS should be trained to provide the centralized Screening and to administer the modified VI-SPDAT. Once a client with a housing instability has cleared the initial Screening for safety concerns, the call should be elevated to CE specialists for Diversion and Homelessness Prevention components. These same CE specialists should provide the assessment for Diversion and Homelessness Prevention services.

Temporary Shelter

If the CE specialists are unable to divert or prevent homelessness, the CE specialists will review the modified VI-SPDAT results, the bed availability at the appropriate shelter(s), any wait list and temporary shelter criteria before authorizing a temporary shelter placement or waiting list referral. In filling an empty bed(s), the CE specialists will identify the person or family being highest on the priority at the time of the bed opening using the order of priority. When contacting the next highest prioritized person or family, the CE specialists will contact that person or head of household and offer available options. If a person or family does not choose to take advantage of any offer, the CE specialists will document the decline in HMIS. The person or family will not be sanctioned for future offers.

With an accepted offer, the TLCHB will contact the temporary shelter agency or entity and present that agency or entity with the referral. If, for any reason, a provider should determine that a referred case is ineligible or inappropriate for their programs, Centralized CE Approach and that provider must work jointly to make a more appropriate referral. The CE specialists will also provide HMIS access for the referred agency

Transportation assistance may be required in some cases, and should be budgeted appropriately.

Assessment

If a person or family has been placed in a temporary shelter, the shelter staff will perform an intake with the adult(s) in the households, noting appropriate information for entry into HMIS and review the status of required re-housing documents. SPDATs will only be conducted after the person or family has all of the appropriate re-housing documents. If there are missing re-housing documents and the person or family does not have the means to pay for some or all of the document(s), the shelter staff can assist the person or family to fill out the re-housing document applications and submit. Further, shelter staff will work with any person or family who has a member who has

been identified as having a diagnosed mental illness to secure a completed and executed Housing Impairment Form. The shelter staff will forward the form to the appropriate agency staff who will upload the copy into HMIS.

For those in hotel/motel or who choose to remain unsheltered and do not identify a mental illness at coordinated entry, the CE specialists will initiate contact with Community Health Worker (CHW). The CHW will assist the person or family to complete and submit the request for the re-housing document voucher application to the TLCHB Grants Administrator (GA) and link them to needed services. Further CHW will work with any person or family who has a member who has been identified as having a diagnosed mental illness to secure a completed and executed Housing Impairment Form. The CHW will forward the form to the appropriate agency staff who will upload the copy into HMIS.

For those in hotel/motel or who choose to remain unsheltered and do identify a mental illness at coordinated entry, the CE specialists will initiate contact with PATH. PATH will assist the person or family to complete and submit the request for the re-housing document voucher application to the TLCHB Grants Administrator (GA) and link them to needed services. Further, PATH will work with any person or family who has a member who has been identified as having a diagnosed mental illness to secure a completed and executed Housing Impairment Form. PATH will forward the form to the appropriate agency staff who will upload the copy into HMIS.

Upon approval of the voucher, the TLCHB GA will send the approved re-housing voucher(s) back to the requesting case manager, CHW or PATH staff member. For state IDs, the case manager will provide the voucher to the person or client for presentation at the Bureau of Motor Vehicles (BMV) to secure the state ID; the BMV will bill TLCHB directly for payment. For birth certificates, the case manager will secure a check(s) from his/her employer in an amount to pay for all needed household birth certificates and present them to the appropriate governmental body, either in person, electronically or through the mail. Upon receipt of birth certificates and Housing Impairment forms, the appropriate agency staff will scan and upload the scanned copies into HMIS.

After a person or family who has all of their re-housing documents for all household members and Housing Impairment form(s) if needed, a trained and approved CoC partner staff member will perform the assessment (SPDAT or F-SPDAT) preferably on-site. The shelter staff, the CHW or the PATH worker will schedule the SPDAT or F-SPDAT between the person or head of household and the trained and approved CoC partner staff member. The staff member performing the SPDAT or F-SPDAT will either upload the SPDAT or F-SPDAT in HMIS or have the appropriate agency staff upload the assessment into HMIS. Then either staff member performing the SPDAT or F-SPDAT or the shelter case manager, the CHW or PATH Worker will notify the TLCHB Communications & Data Specialist (CDS) that the SPDAT/F-SPDAT, the re-housing

documents and, if required, the Housing Impairment form has been uploaded into HMIS.

Permanent Housing Placement

Weekly, the TLCHB CDS will update the community SPDAT list. Once updated, the TLCHB Communications & Data Specialist will review the SPDAT scores, the order of priorities and any open permanent housing provider units and then make referrals for the highest ranked person or families into any open units. The TLCHB CDS will match the highest ranked person or family with any permanent housing openings for which they may qualify. If there is no available unit (including meeting the program criteria) for the highest ranked person or family, the TLCHB (CDS will move to next highest ranked individual who does qualify for the open unit. If a person or family is skipped for placement due to either refusal of the placement or unavailability of a unit for which the person or family meets program qualifications, that person or family will be continued on the list.

The permanent housing placements are generally made primarily upon their SPDAT score and availability of permanent housing for which they qualify. For those scoring less than 20 on the SPDAT and those scoring less than 27 on the F-SPDAT, no permanent housing options will be offered; those persons or families will be referred to the appropriate supportive services and are expected to self-resolve their homelessness. Those persons or families scoring between 20 and 27 on the SPDAT or between 27 and 40 on the F-SPDAT are eligible for Rapid Re-Housing financial assistance and services. Those scoring between 28 and 34 on the SPDAT or between 41 and 53 and do not have the ability to increase their earned income will be eligible for short or medium term rapid re-housing financial assistance and services, with a maximum of \$2,400 of rental assistance unless making progress on their housing stability plan. Those scoring between 28 and 34 on the SPDAT or between 41 and 53 and do have the ability to increase their earned income will be eligible for TBRA, renewable quarterly based upon being recertified as program eligible and progressing on their housing stability plan.

If the person or family has a disability as documented on a Housing Impairment form or has SSI or SSDI and scores less than 35 on the SPDAT or less than 54 on the F-SPDAT may be eligible for rapid re-housing, TBRA, or Housing Choice Vouchers (HCV) depending on a meeting of eligibility qualifications. If the person or family with the above SPDAT or F-SPDAT score has ongoing case management and meets LMHA's HCV client eligibility, the person or family is eligible for HCV voucher. If the person or family with the above SPDAT or F-SPDAT score, does not have ongoing case management services and/or does not meet HCV LMHA's HCV client eligibility but has the ability to increase their earned income, the person or family is eligible for TBRA financial services. If the person or family with the above SPDAT or F-SPDAT score, does not have ongoing case management services, does not have the ability to increase earned income, and/or does not meet HCV LMHA's HCV client eligibility, the person or family is

eligible for rapid re-housing financial assistance and services; but if this qualifying person or family with a disability fails in RRH program, they would be eligible for PSH.

If a person or family scores 35 or greater on the SPDAT or 54 or greater on the F-SPDAT, this person or family is eligible for PSH. But they are also eligible for rapid re-housing financial assistance or services and TBRA or HCV if they meet those two programs eligibility if they do not want to wait for PSH opening without penalty. Failing in any of those programs, the person or family will be re-assess and again eligible for PSH financial assistance and services.

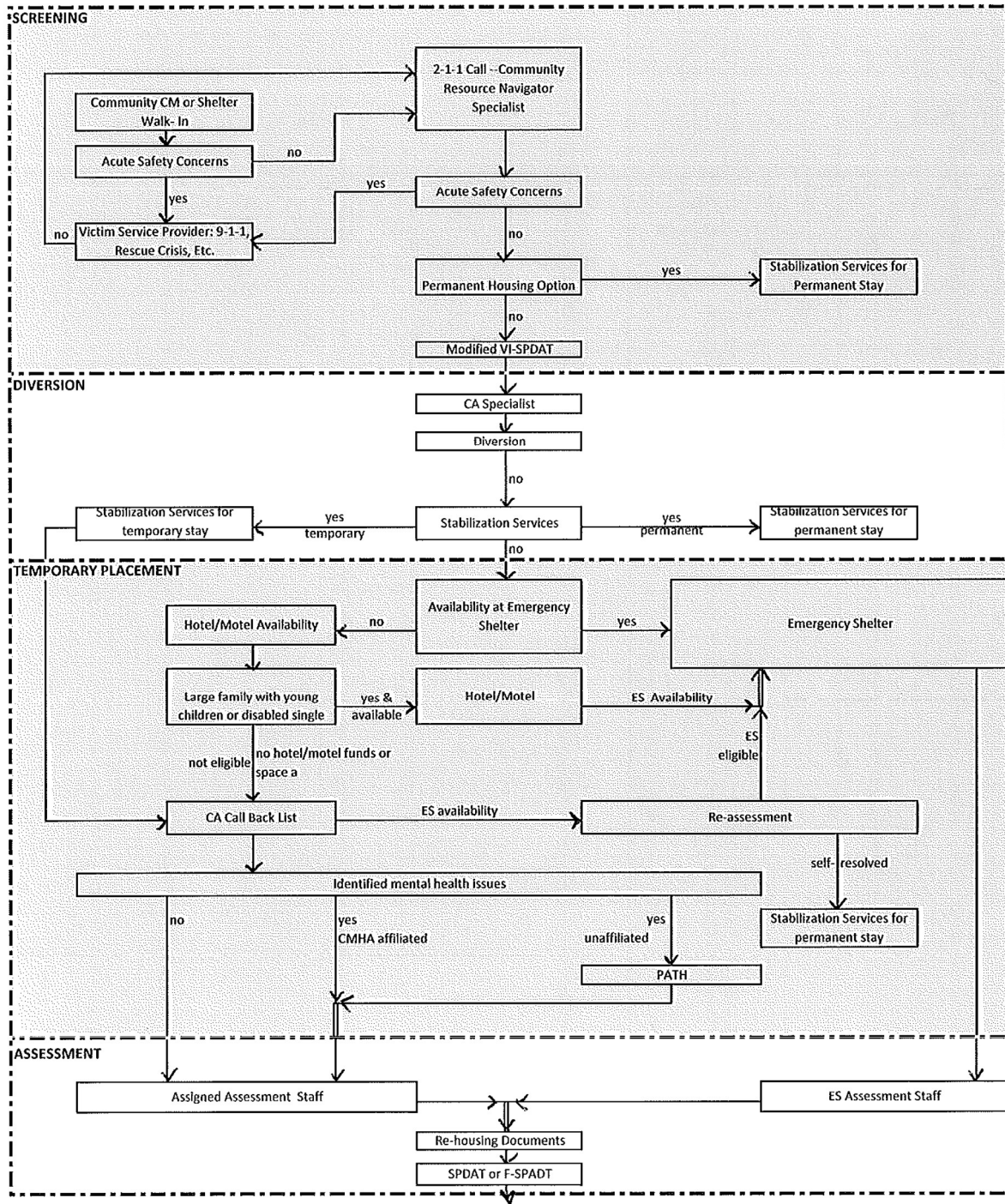
Mutual Responsibility for Appropriate Referrals

Whether through the Housing Collaborative Network or another body, participating providers must have the opportunity and responsibility to influence the design of Centralized CE Approach and provide feedback on the cases being referred to them. If, for any reason, a provider should determine that a referred case is ineligible or inappropriate for their programs, CE specialists and that provider must work jointly to make a more appropriate referral.

Putting it All Together

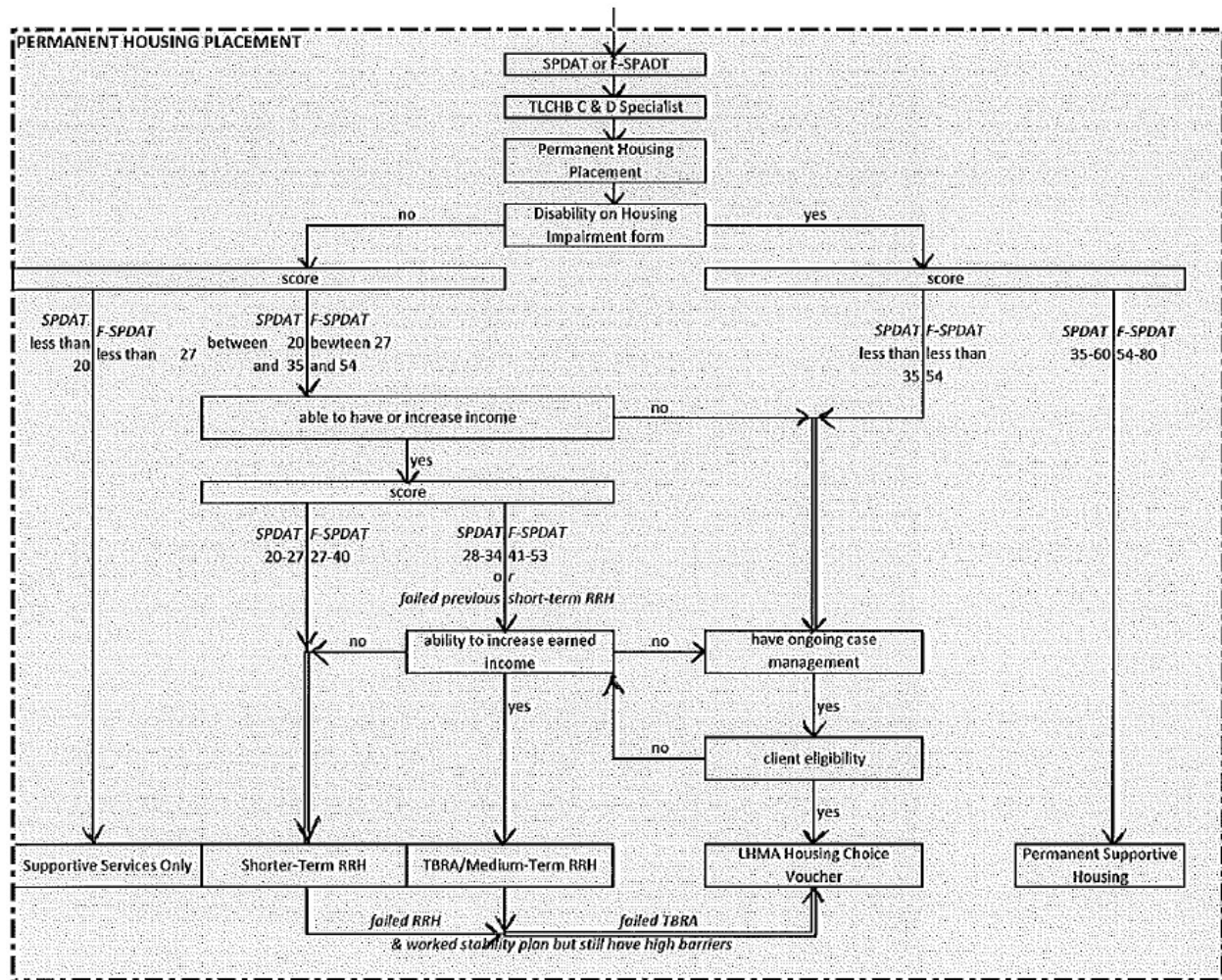
The following chart is intended to help visualize the interaction of the pieces in this system and the movement of households through the stages of Screening, Diversion, and Temporary Placement. The shaded areas marked as Screening, Diversion, and Temporary Placement would all take place through United Way 2-1-1. The securing of re-housing documents and, if required, Housing Impairment form is the responsibility of the person or family assisted by the assigned shelter case manager, the CHW or PATH worker who ensures that they are uploaded into HMIS and notify the appropriate CoC partner staff trained in conducting the assessment. Once the assessment is completed and uploaded, the responsible shelter case manager, the CHW or PATH worker notifies the TLCHB Communications and Data Specialist of that upload. The TLCHB Communications and Data Specialist then updates the Community SPDAT lists and makes referrals of the most severest ranked person or family based upon the TLCHB order of priorities and who meets any of the program criteria of an available housing unit to the appropriate Permanent Housing Provider.

REVISED FLOWCHART FOR COORDINATED ASSESSMENT



Recommendations for Centralized Approach to Coordinated Access-Entry/Approved by Toledo Lucas County Homelessness Board on 22 August 2012/

Amended version recommended by HCN on 18 October 2017/Amended by Toledo Lucas County Homelessness Board on 15 November 2017



**SF-424,
CERTIFICATIONS
AND ORDINANCES**

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☐ New
☒ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

34-6401447

5a. Federal Entity Identifier:

34-6401447

5b. Federal Award Identifier:

B-22-MC-39-0021

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:** City of Toledo, Dept. of Housing and Community Development

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

34-6401447

*** c. UEI:**

N669DP1XJCH6

d. Address:

*** Street1:** One Government Center, Suite 1800

Street2:

*** City:** Toledo

County/Parish:

Lucas

*** State:** OH: Ohio

Province:

*** Country:** USA: UNITED STATES

*** Zip / Postal Code:** 43604-2209

e. Organizational Unit:

Department Name:

Hsg. & Community Development

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Ms.

*** First Name:** Rosalyn

Middle Name:

*** Last Name:** Clemens

Suffix:

Title: Dir., Dept. of Hsg. & Community Development

Organizational Affiliation:

*** Telephone Number:** (419) 245-1400

Fax Number: (419) 245-1192

*** Email:** rosalyn.clemens@toledo.oh.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

48th Year Community Development Block Grant Program

*** 12. Funding Opportunity Number:**

B-22-MC-39-0021

* Title:

FY22: CDBG-CFDA #14.218

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

City of Toledo.docx

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Programmatic and operational plan for improving the physical, economic & social conditions, & quality of life for citizens through community development, economic development, & housing activities.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

[Add Attachment](#)[Delete Attachment](#)[View Attachment](#)**17. Proposed Project:*** a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="7,373,648.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text" value="1,914,215.00"/>
* f. Program Income	<input type="text" value="282,316.00"/>
* g. TOTAL	<input type="text" value="9,570,179.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

[Add Attachment](#)[Delete Attachment](#)[View Attachment](#)

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:Prefix: * First Name: Middle Name: * Last Name: Suffix: * Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

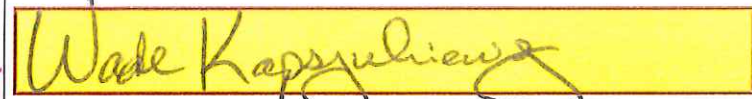
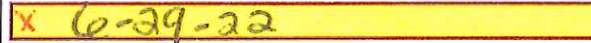
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor, City of Toledo
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Toledo, Dept. of Housing & Community Development	

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☐ New
☒ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

34-6401447

5a. Federal Entity Identifier:

34-6401447

5b. Federal Award Identifier:

E-22-MC-39-0021

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:** City of Toledo, Dept. of Housing and Community Development

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

34-6401447

*** c. UEI:**

N669DP1XJCH6

d. Address:

*** Street1:** One Government Center, Suite 1800

Street2:

*** City:** Toledo

County/Parish:

Lucas

*** State:** OH: Ohio

Province:

*** Country:** USA: UNITED STATES

*** Zip / Postal Code:** 43604-2209

e. Organizational Unit:

Department Name:

Hsg. & Community Development

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Ms.

*** First Name:** Rosalyn

Middle Name:

*** Last Name:** Clemens

Suffix:

Title: Dir., Dept. of Hsg. & Community Development

Organizational Affiliation:

*** Telephone Number:** (419) 245-1400

Fax Number: (419) 245-1192

*** Email:** rosalyn.clemens@toledo.oh.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

36th Year Emergency Solutions Grant Program (ESG)

*** 12. Funding Opportunity Number:**

E-22-MC-39-0021

* Title:

Funding Availability for the Emergency Solutions Grants (ESG) Program

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

City of Toledo.docx

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Provision of homelessness prevention, rapid re-housing, and housing stabilization activities to eliminate homelessness.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="638,314.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="638,314.00"/>

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number:

Fax Number:

* Email:

* Signature of Authorized Representative:

X 

* Date Signed: X

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009

Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

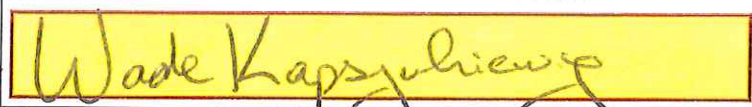
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	<div data-bbox="899 1325 1484 1358" style="border: 1px solid black; padding: 2px;">Mayor, City of Toledo</div>
APPLICANT ORGANIZATION	DATE SUBMITTED
<div data-bbox="131 1449 878 1499" style="border: 1px solid black; padding: 2px;">City of Toledo, Dept. of Housing & Community Development</div>	<div data-bbox="899 1449 1484 1499" style="border: 1px solid black; padding: 2px;">X 6-29-22</div>

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

☐ New
☒ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

34-6401447

5a. Federal Entity Identifier:

34-6401447

5b. Federal Award Identifier:

M-22-MC-39-0212

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:** City of Toledo, Dept. of Housing and Community Development

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

34-6401447

*** c. UEI:**

N669DP1XJCH6

d. Address:

*** Street1:** One Government Center, Suite 1800

Street2:

*** City:** Toledo

County/Parish:

Lucas

*** State:** OH: Ohio

Province:

*** Country:** USA: UNITED STATES

*** Zip / Postal Code:** 43604-2209

e. Organizational Unit:

Department Name:

Hsg. & Community Development

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Ms.

*** First Name:** Rosalyn

Middle Name:

*** Last Name:** Clemens

Suffix:

Title: Dir., Dept. of Hsg. & Community Development

Organizational Affiliation:

*** Telephone Number:** (419) 245-1400

Fax Number: (419) 245-1192

*** Email:** rosalyn.clemens@toledo.oh.gov

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

31st Year HOME Investment Partnerships Program

* 12. Funding Opportunity Number:

M-22-MC-39-0212

* Title:

FY22: HOME-CFDA #14.239

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

City of Toledo.docx

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

Housing Rehabilitation Program: Owner-occupied rehabilitation, Down Payment Assistance, housing development, CHDO set-aside, and tenant-based rental assistance.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="2,385,225.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text" value="1,956,997.00"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="4,342,222.00"/>

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative:



* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

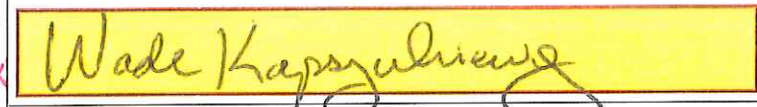
As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
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Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).

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17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	<div data-bbox="906 1333 1490 1375">Mayor, City of Toledo</div>
<div data-bbox="131 1438 883 1480">APPLICANT ORGANIZATION</div> <div data-bbox="131 1480 883 1516">City of Toledo, Dept. of Housing & Community Development</div>	<div data-bbox="906 1438 1490 1480">DATE SUBMITTED</div> <div data-bbox="906 1480 1490 1516">X 6-29-22</div>

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

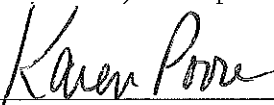
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

x 

Signature of Authorized Official

x 6/22/22

Date

Mayor, City of Toledo

Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) July 1, 2022 – June 30, 2023 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

x Karen Pore
Signature of Authorized Official

x 6/22/22
Date

Mayor, City of Toledo
Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

x Karen Pore
Signature of Authorized Official

x 7/22/22
Date

Mayor, City of Toledo
Title

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

X Karen Pore
Signature of Authorized Official

X 6/22/00
Date

Mayor, City of Toledo
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.



Legislation Text

File #: O-325-22, Version: 1

48th (2022) Year CDBG
Department of Housing and Community Development
Bonita Bonds (x1401)
(Revised)

Repealing in its entirety Ord. 176-22; authorizing the Mayor to accept, deposit, appropriate and expend the Community Development Block Grant (CDBG) from the U.S. Department of Housing and Urban Development (HUD) in the amount of \$7,373,648; authorizing the expenditure of CDBG carryover funds from all years prior to program year 2022 (48th) in the amount of \$1,914,215; and authorizing submission to the U.S. Department of Housing and Urban Development of the 2022-2023 Annual Action Plan; and declaring an emergency.

SUMMARY & BACKGROUND:

Ordinance #176-22 passed by Council and signed by the Mayor was an estimate of what was anticipated to be received from the Department of Housing and Urban Development (HUD) for the Community Development Block Grant (CDBG). The City of Toledo was informed by HUD it will now receive \$7,373,648 for fiscal year 2022, a reduction of \$219,867. This Ordinance makes the necessary amendments to Ordinance 176-22 by amending the relevant Sections in said legislation.

The financial impact of this Ordinance is the receipt of \$7,373,648; \$219,867 less than what was anticipated from HUD to the City of Toledo for the CDBG Program.

NOW, THEREFORE, Be it ordained by the Council of the City of Toledo:

SECTION 1. That Ordinance 176-22 is hereby repealed in its entirety.

SECTION 2. That the Mayor is authorized to submit the 2022-2023 Annual Action Plan; accept the 2022 (48th) Program Year CDBG allocation from HUD in the amount of \$7,373,648; and deposit the amount received from HUD into Account Code 2015-16100-407400-5G48000STDREV (Community Development Block Grant Fund) for the purpose of funding the CDBG Program.

SECTION 3. That the appropriation in the amount of \$7,373,648 is authorized from the unappropriated grant proceeds in the Community Development Block Grant Fund into various accounts; and further authorizing the expenditure of same pursuant to the revised attached Schedule A; also authorizing the expenditure of a portion of the CDBG carryover balance in the Community Development Block Grant Fund from all years prior to program year 2022 (48th) in the amount of \$1,914,215 pursuant to Schedule B.

SECTION 4. That the Mayor and the Director of Neighborhoods are authorized to enter into any necessary agreements for the purposes listed herein subject to the terms and conditions deemed proper and requisite according to the Director of Law, not to exceed the amount of \$7,373,648 for the 2022 (48th) Year CDBG and not to exceed \$1,914,215 from the CDBG carryover balance from all years prior to program year

SECTION 5. That the Finance Director is authorized to issue his warrant or warrants in an amount not to exceed \$7,373,648 from the Community Development Block Grant Fund in payment of all obligations authorized under the 48th (2022) Year CDBG allocation and not to exceed \$1,914,215 from the CDBG carryover balance from all years prior to program year 2022 (48th) upon presentation of properly approved documentation.


SECTION 6. That this Ordinance is declared to be an emergency measure and shall take effect and be in force from and after its passage. The reason for the emergency lies in the fact that same is necessary for the immediate preservation of the public peace, health, safety and property, and for the further reason that same must be immediately effective in order to permit the City to submit the 2022-2023 Annual Action Plan, qualify under the regulations of the Community Development Block Grant Entitlement Program, and to receive the money necessary to carry out its planned community development activities for the 48th (2022) year beginning July 1, 2022 and ending June 30, 2023.

Vote on emergency clause: yeas 11, nays 0.

Passed: JUN 21 2022, as an emergency measure: yeas 11, nays 0.

Attest:


Clerk of Council


President of Council

Approved:

JUN 27 2022


Mayor

Schedule A

CITY OF TOLEDO

DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT

CDBG ALLOCATIONS FOR 48th PY and

OTHER DEPARTMENTAL ALLOCATIONS

(July 1, 2022 - June 30, 2023)

PUBLIC SERVICE ACTIVITIES

<u>THIRD PARTY PARTNERS</u>	<u>CDBG</u>	<u>Reduction in CDBG</u>
Arts Commission	\$ 22,000.00	
Aurora Project	\$ 90,000.00	
Believe Center	\$ 45,000.00	
Compassion Health Toledo	\$ 64,737.00	
Family House	\$ 56,000.00	
Grace Community Center	\$ 46,609.00	
Legal Aid of Western Ohio	\$ 100,000.00	
Martin Luther King Kitchen for the Poor	\$ 54,000.00	
Neighborhood Health Association	\$ 154,647.00	
Sofia Quintero Art & Cultural Center	\$ 80,000.00	
Toledo GROWS	\$ 46,000.00	
Toledo Lucas County Homelessness Board	\$ 112,054.20	\$ 112,054.20
Toledo Seagate Food Bank	\$ 60,000.00	
Unison Health	\$ -	\$ (169,860.00)
SUBTOTAL	\$ 931,047.20	

CAPACITY, HOUSING, and OTHER ACTIVITIES

East Toledo Family Center	\$ 60,000.00	
Economic and Community Development Institute (ECDI)	\$ 50,000.00	
Historic South Initiative	\$ 100,000.00	
Ironwood Architectural Assessment	\$ 10,000.00	
Lucas Housing Services Program	\$ 100,000.00	\$ 25,000.00
Maumee Valley Habitat for Humanity	\$ 400,000.00	
NeighborWorks Toledo Region	\$ 305,000.00	
Pathway, Inc. (formerly EOPA)	\$ 400,000.00	
Toledo Design Collective	\$ 28,000.00	

Toledo Fair Housing Center	\$	150,000.00
SUBTOTAL	\$	1,603,000.00

COT DEPARTMENTAL ALLOCATIONS

COT: Department of Economic Development - Toledo Inclusive Grant	\$	120,000.00
COT: Department of Law - Housing Prosecutor	\$	51,602.00
COT: Department of Housing and Community Development:		
COT Rooftop Program	\$	300,000.00
Division of Administrative Services	\$	1,199,704.60
Division of Housing	\$	900,000.00
COT: Division of Code Enforcement:	\$	1,235,824.20
COT: Department of Parks and Recreation:		
Clinton Park Playground	\$	150,000.00
Highland Park Playground	\$	200,000.00
Jamie Farr Shelter Renovations	\$	200,000.00
Maya Park Playground	\$	150,000.00
Navarre Park Playground	\$	100,000.00
Ironwood Community Center Rehabilitation Project	\$	85,785.00
Toledo/Lucas County Plan Commission	\$	87,025.00
Toledo/Lucas County Regional Health District	\$	59,660.00
SUBTOTAL	\$	4,839,600.80
GRAND TOTAL	\$	7,373,648.00

Schedule B

Community Development Block Grant

Expenditure of Carryover Funds

Following are programs that will be funded with a portion of the CDBG carryover balance from years prior to the 2021 (47th) CDBG Program Year:

<u>Program</u>	<u>Amount</u>
Ironwood Community Center Rehabilitation Project	\$ 214,215.00
J Frank Troy Center - Senior Center Improvements	\$ 100,000.00
Local Initiatives Support Corporation (LISC) - Equity & Inclusion Partnership	\$ 500,000.00
Police Athletic League - PAL Field	\$ 600,000.00
St. Martin De Porres - Community Center Improvement	\$ 300,000.00
YMCA - Architectural Design	\$ 200,000.00
Grand Total	\$ 1,914,215.00



Legislation Text

File #: O-326-22, Version: 1

36th (2022) Program Year ESG
Department of Housing and Community Development
Bonita Bonds
419-245-1401
(Revised)

Repealing in its entirety Ord. 177-22; authorizing the Mayor to accept, deposit, appropriate, and expend the Emergency Solutions Grant (ESG) in an amount of \$638,314 from the U.S. Department of Housing and Urban Development to fund Emergency Solutions Grant Program activities; authorizing submission to the U.S. Department of Housing and Urban Development the One-Year Action Plan; and declaring an emergency.

SUMMARY & BACKGROUND:

Ordinance 177-22 passed by Council and signed by the Mayor was an estimate of what was anticipated to be received from the Department of Housing and Urban Development (HUD) for the Emergency Solutions Grant (ESG). The City of Toledo was informed by HUD it will now receive \$638,314 for fiscal year 2022, a reduction of \$7,302 dollars. This Ordinance makes the necessary amendments to Ordinance 177-22 by amending relevant Sections in said legislation.

The financial impact of this Ordinance is the receipt of \$638,314; \$7,302 less than what was anticipated from HUD to the City of Toledo for the ESG Program.

NOW, THEREFORE, Be it ordained by the Council of the City of Toledo:

SECTION 1. That Ordinance 177-22 is hereby repealed in its entirety.

SECTION 2. That the Mayor is authorized to submit the 2022-2023 Annual Action Plan; accept the 2022 (36th) Program Year ESG allocation from HUD in the amount of \$638,314; and deposit the amount received from HUD into Account Code 2016-16100-407400-5GE3602STDREV (Operations Grant Fund) for the purpose of funding the ESG program.

SECTION 3. That the appropriation in the amount \$638,314 is authorized from the unappropriated grant proceeds in the Operations Grants Fund into various accounts; and further authorizing the expenditure of same pursuant to the revised attached Schedule A.

SECTION 4. That the Mayor and the Director of Housing and Community Development are authorized to enter into any necessary agreements for the purposes listed herein subject to the terms and conditions deemed proper and requisite according to the Director of Law, not to exceed the amount of \$638,314 for the 2022 (36th) Year ESG.

SECTION 5. That the Finance Director is authorized to issue his warrant or warrants in an amount not


to exceed \$638,314 from the Operations Grant Fund in payment of all obligations authorized under the 2022 (36th) Year ESG allocation upon presentation of properly approved documentation.

SECTION 6. That this Ordinance is declared to be an emergency measure and shall take effect and be in force from and after its passage. The reason for the emergency is the fact that this Ordinance is necessary for the immediate preservation of the public peace, health, safety and property, and for the further reason that this Ordinance must be immediately effective in order to allow the City of Toledo to implement the 2022-2023 One Year Action Plan submitted to HUD on June 30th, 2022 as it relates to the ESG funds to be received from HUD and pursuant to HUD regulations.

Vote on emergency clause: yeas 11, nays 0.

Passed: JUN 21 2022, as an emergency measure: yeas 11, nays 0.

Attest:


Clerk of Council


President of Council

Approved:

JUN 27 2022


Mayor

Schedule A

CITY OF TOLEDO
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
ESG ALLOCATIONS FOR 36th PY
(July 1, 2022 - June 30, 2023)

PUBLIC SERVICE ACTIVITIES FOR HOMELESS SERVICE PROVIDERS		Reduction in ESG
ESSENTIAL SERVICES		
Beach House	\$	76,755.00
Family House	\$	120,000.00
St. Paul's Community Center	\$	100,000.00
Sub-total	\$	296,755.00
STABILIZATION SERVICES		
Beach House	\$	136,800.00
United Way - Diversion/Central Intake	\$	115,500.00
TLCHB - ADMINISTRATIVE OPERATIONS	\$	47,873.55
TLCHB - HMIS	\$	41,385.45
Sub-Total	\$	341,559.00
GRAND TOTAL - ESG	\$	638,314.00
		\$ (7,302.00)



Legislation Text

File #: O-327-22, Version: 1

31st (2022) Program Year HOME
Department of Housing and Community Development
Rosalyn Clemens
419-936-3647
(Revised)

Repealing in its entirety Ord. 178-22; authorizing the Mayor to accept, deposit, appropriate and expend the HOME Investment Partnership Program Grant in the amount of \$2,385,225 from the U.S. Department of Housing and Urban Development (HUD) for the purpose of funding the 2022 HOME Investment Partnership Program; authorizing the expenditure of HOME Carryover funds from all years prior to program year 2022 (31st) in the amount of \$1,889,320.05; and authorizing submission to the U.S. Department of Housing and Urban Development the 2022-2023 Annual Action Plan; and declaring an emergency.

SUMMARY & BACKGROUND:

Ordinance #178-22 passed by Council and signed by the Mayor was an estimate of what was anticipated to be received from the Department of Housing and Urban Development (HUD) for the HOME Investment Partnership Program (HOME). The City of Toledo was informed by HUD it will now receive \$2,385,225 for fiscal year 2022, an increase of \$205,248. This Ordinance makes the necessary amendments to Ordinance 178-22 by amending the relevant Sections in said legislation.

The financial impact of this Ordinance is the receipt of \$2,385,225; \$205,248 more than what was anticipated from HUD to the City of Toledo for the HOME Program.

NOW, THEREFORE, Be it ordained by the Council of the City of Toledo:

SECTION 1. That Ordinance 178-22 is hereby repealed in its entirety.

SECTION 2. That the Mayor is authorized to submit the 2022-2023 Annual Action Plan to HUD, as well as, accept the 31st (2022) Program Year HOME allocation from HUD in the amount of at \$2,385,225 and deposit the amount received from HUD into Account Code 2025 16200 407400 5GH3102STDREH (Toledo HOME Program Fund) pursuant to HUD regulations.

SECTION 3. That the appropriation in the amount of \$2,385,225 is authorized from the unappropriated grant proceeds in the Toledo HOME Program Fund into various accounts within 2025-16200, and further authorizing the expenditure of the same pursuant to the revised Schedule A. The expenditure of a portion of the HOME carryover balance in the HOME Fund from all years prior to program year 2022 (31st) in the amount of \$1,889,320.05 pursuant to Schedule B.

SECTION 4. That the Mayor and the Director of Housing and Community Development are authorized to enter into the necessary contracts or agreements to implement the activities and programs described in the

2022-2023 Annual Action Plan in furtherance of HUD objectives and pursuant to HUD regulations, directives and guidelines, as applicable and pertinent to the HOME Grant.

SECTION 5. That the Finance Director is authorized to issue his warrant or warrants against Account Code 2025-16200 in an amount not to exceed \$2,385,225 from the HOME fund in payment of all obligations authorized under the 2022 (31st) year and not to exceed \$1,889,320.05 from the HOME carryover balance from all years prior to program year 2022 (31st) upon presentation of properly approved documentation.

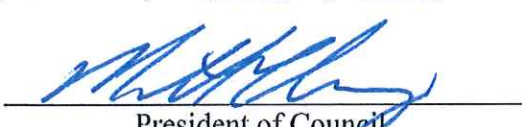
SECTION 6. That this Ordinance is declared to be an emergency measure and shall take effect and be in force from and after its passage. The reason for the emergency is the fact that this Ordinance is necessary for the immediate preservation of the public peace, health, safety and property, and for the further reason that this Ordinance must be immediately effective in order to allow the City of Toledo to submit the 2022-2023 Annual Action Plan, qualify under the regulations of the HOME Investment Partnership Program, and to receive the money necessary to carry out its planned affordable housing development activities for the 31st (2022) year beginning July 1, 2022, and ending June 30, 2023.

Vote on emergency clause: yeas 11, nays 0.

Passed: JUN 21 2022, as an emergency measure: yeas 11, nays 0.

Attest:


Clerk of Council


President of Council

Approved:

JUN 27 2022


Mayor

Schedule A Revised 05.26.2022		Increase in HOME
HOME PROGRAMMING FOR 31st PY (July 1, 2022-June 30, 2023)		
HOME Administration	\$ 238,522.50	\$ 20,524.50
Community Housing Development Organization (CHDO) Set-aside	\$ 357,783.75	\$ 30,787.75
Home-owner Rehabilitation (Subrecipient & Internal)	\$ 300,000.00	\$ 50,000.00
Rental Housing Development	\$ 1,188,918.75	\$ 3,935.75
Down-Payment Assistance (HOME At Last Program)	\$ 100,000.00	
Homebuyer Development	\$ 200,000.00	\$ 100,000.00
GRAND TOTAL	\$ 2,385,225.00	\$ 205,248.00

Schedule B	
HOME GRANT EXPENDITURE CARRYOVER FUNDS PRIOR TO 31st PY	
Community Housing Development Organization (CHDO) Set-aside	\$ 246,699.40
Home-owner Rehabilitation (Subrecipient & Internal)	\$ 289,837.30
Development Pool	\$ 1,352,783.35
GRAND TOTAL	\$ 1,889,320.05